Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.12 Statement of Common Ground with Environment Agency

APFP Regulation 5(2)(q)

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

September 2026

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1. Introduction

1.1. Overview

1.1.1. This Statement of Common Ground (SoCG) has been prepared to support the examination process for the proposed Meridian Solar Farm. A DCO application has been made by Meridian Solar Farm Limited ('the Applicant') to the Secretary of State pursuant to Section 37 of the Planning Act 2008[1], which was accepted for examination by the Secretary of State pursuant to Section 55 of the Planning Act 2008 on 15 April 2026.

1.1.2. SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the examination. The purpose and possible content of SoCGs is detailed in the Ministry of Housing, Communities and Local Government's guidance entitled 'Planning Act 2008: Guidance on the examination stage of an application' (2026)[2], which states:

"*A SoCG is a written statement prepared jointly by the applicant and another interested party or parties but led and submitted by the applicant, setting out the factual matters about the application on which they agree, for example, on data or methodologies concerning the determination of any significant effects, but can just as helpfully record disagreement.*

…

SoCGs are expected to be concise and focused on the key issues, with the scope agreed between the parties from the outset of discussions on the application during the pre-application stage. SoCGs are often revised during the course of the examination as matters are agreed or disagreements clarified between the applicant and interested parties."

1.1.3. This document relates to matters between the Applicant and the Environment Agency (EA). It has been prepared jointly by the Applicant and the EA, and the EA has reviewed the Applicant's position as set out. It confirms to the Examining

[1] The Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents [Accessed 11 August 2026]
[2] MHCLG (2026) Guidance Planning Act 2008: Guidance on the examination stage of an application. Available at: https://www.gov.uk/guidance/planning-act-2008-guidance-on-the-examination-stage-of-an-application [Accessed 2 September 2026]

Authority where agreement has been reached between the parties, and where agreement has not (yet) been reached. This SoCG does not seek to replicate information that is available elsewhere, either within the DCO application and/or examination documents, referring out where appropriate.

1.1.4. The terminology used within the SoCG to reflect the status between the parties is either:

- "Agreed" to indicate where a matter has been resolved to the satisfaction of the parties.
- "Not Agreed" to indicate a final position where parties cannot agree.
- "Under Discussion" to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.

1.1.5. Where matters would require the involvement of third parties in order to come to an agreement, these dependencies are noted.

2. Record of Engagement

2.1. Summary of Engagement Undertaken

2.1.1. Table 2-1 summarises the key meetings and correspondence between the parties subject to this SoCG.

Table 2-1: Record of Engagement

Date	Form of Engagement	Details
January 2024	Email	• The EA confirmed the existing fluvial defences reducing the risk of flooding to the Site consist of Crowland-Cowbit Washes and embankment. • The EA confirmed that the principal source of flooding to be considered is the River Welland, specifically breaching of the adjacent flood defence. • EA advised the 2017 SFRA breach locations are considered adequate for the Site. Further modelling analysis is not required, the 2017 SFRA hazard mapping can be used and is appropriate for this application. • EA advised that flood-sensitive infrastructure should be elevated above the 0.1% +climate change breach flood level.
19/12/2024	Online Meeting	Meeting with representatives from EA National Infrastructure Team to agree scope of hydraulic modelling analysis required to inform Scheme design and the Flood Risk Assessment (FRA).
24/04/2025	Online Meeting	Discussed approach to hydraulic modelling parameters and design requirements for mitigation approach.
28/07/2025	Online Meeting	• The Applicant provided an update of the hydraulic model results for the River Welland and Postland Pumped Catchment and discussed how these results are being used to assess flood risk in the FRA. • Discussed potential mitigation for the solar PV panels as a result of the modelling, and summarised volumetric loss calculations that were undertaken for the solar PV panel legs/poles.

Date	Form of Engagement	Details
20/01/2026	Online Meeting	• Discussed approach and results of the draft FRA. • Discussed the six solar stations located within Flood Zone 3b in Gotts Catchment, which have been raised on plinths to provide 600mm freeboard above the design flood level upon EA's request. • Discussed that the increase in flood depth caused by submerged panels (including mounting infrastructure) in a worst case scenario for the River Welland breach event scenario is approximately 9mm. EA noted no significant concerns.
04/02/2026	Email	Issued River Welland Breach Hydraulic Modelling Report to the EA, as requested at previous meeting.
23/06/2026	Email	Issued hydraulic model files to the EA, as requested via email.
15/07/2026	Online Meeting	Meeting to discuss flood risk comments from the EA's Relevant Representation.
20/08/2026	Online Meeting	Regular catch up call to discuss the preparation of the SoCG.
16/09/2026	Online Meeting	Meeting to discuss comments on the South Holland, River Welland and Postland hydraulic modeling, and Outline Flood Emergency Response Plan to be submitted by Deadline 2.

3. Statement of Common Ground

3.1. Estates

Table 3-1 Estates

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
1.1	Compulsory Acquisition	The EA as landowner has contacted the applicant's solicitor regarding the proposed compulsory acquisition of Environment Agency land as part of the scheme. The current order limit boundary indicates that a small slither of in-land drainage ditch/bank has been included, which forms part of the adjacent statutory Flood Storage Reservoir (FSR). This land is managed in accordance with the requirements of the Reservoirs Act. It is not clear why compulsory acquisition of this parcel of land is required. The EA may require access rights across the Scheme for inspecting the FSR, as well as permanent clear access for maintenance and repairs to the reservoir banks. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has updated the **Land and Crown Land Plans – Section A Solar Development Area** (Doc Ref. 2.4 Rev 2), **Book of Reference** (Doc Ref. 4.3 Rev 2), **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref. 7.16 Rev 1) to exclude any works from the land within the ownership of the EA. In addition, the Applicant has updated **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans** of the **OLEMP** (Doc Ref. 7.16 Rev 1) to show an 8m buffer from the EA land ownership boundary and to provide an access arrangement to the FSR. These requirements have also been included within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1) and **Outline Decommissioning Environmental**	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			Management Plan (ODEMP) (Doc Ref. 7.12 Rev 1) submitted at Deadline 1.	

3.2. Draft Development Consent Order

Table 3-2 Draft Development Consent Order

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
2.1	EA1 EA3 EA4	Draft DCO	The EA suggests alterations to the wording of the **Draft Development Consent Order** (DCO) (Doc Ref. 3.1 Rev 2) with regards to the implementation of environmental management plans for specified pre-commencement construction activities, the use of the phrase 'substantially in accordance with' and a request to be included as a named consultee on certain relevant Requirements. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has amended Requirement 12 in the **Draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1, so that specified permitted preliminary works cannot commence until a CEMP has been approved. Certain low-risk permitted preliminary works remain excluded from the requirement where a CEMP is not considered necessary. The Applicant considers that the amended drafting appropriately secures the environmental mitigation measures contained within the CEMP. The Applicant considers that the phrase "substantially in accordance with" is appropriate and reflects established DCO drafting practice, providing flexibility for minor changes which may (for example) be required to reflect detailed design or the most up to date survey information at the time of construction whilst ensuring consistency with the certified outline documents. Similar drafting has been adopted by the Secretary of State	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				for environmental management plans and other certified documents on recent solar NSIP projects, including One Earth Solar Farm Order 2026, Tillbridge Solar Order 2025 and Fenwick Solar Farm Order 2025. The Applicant understands that the Environment Agency wishes to be named as a consultee in respect of Requirements 6 (battery safety management plan) and 10 (surface and foul water drainage). The Applicant notes that the Environment Agency is already identified as a consultee for Requirement 6 of the **Draft DCO** (Doc. Ref 3.1 Rev 2). In respect of Requirement 10, the Applicant has amended this in the **draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1 to include the Environment Agency as a consultee.	
2.2	EA2 EA5	Protective Provisions for the disapplication of Environmental Permitting	The Applicant wishes to disapply the requirement for a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016. Protective Provisions to be included in the Draft DCO covering these requirements are yet to be agreed.	The Applicant has provided Protective Provisions for EA's review and is in the process of engaging with the EA on these. The Applicant has included its preferred form of these protective provisions within the **draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1, noting that these	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		(England and Wales) Regulations 2016		are subject to change depending on ongoing negotiations between the parties].	
2.3	EA6	Discharge of Requirements	There is insufficient time for a named consultee to review and respond to the discharge of requirements to request further information. The LPA must consult a named consultee within 5 working days of receipt of any application to discharge requirements. From the receipt of the consultation the LPA then has a total of 15 working days to request further information. Therefore , the named consultee has just 10 working days to review the consultation & determine if sufficient information has been provided. Risks to the water environment may not be adequately managed. Amend wording to provide 15 working days for named consultees to review the consultation & determine if sufficient information has been provided.	The Applicant considers that the discharge of requirements procedure in Schedule 14 provides an appropriate and proportionate process for consultation and the identification of any further information requirements. The drafting is consistent with that adopted by the Secretary of State in other recent solar NSIP DCOs, including the Tillbridge Solar Order 2025. In addition, Schedule 14 already provides flexibility for alternative timescales to be agreed in writing between the undertaker and the relevant planning authority where appropriate. The Applicant therefore does not consider that the proposed amendment is necessary.	Under Discussion

3.3. Flood Risk

Table 3-3 Flood Risk

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.1	EA7	Use of flood modelling to inform Site layout.	Detailed flood modelling is available but has not been consistently used to inform site layout. Instead, the FRA reverts to standard Flood Zone classifications to define site suitability and to demonstrate the application of a sequential approach to site layout. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant discussed with the EA how detailed hydraulic modelling has been used to inform the Site layout during the meeting held on 15 July 2026. This included the use of detailed hydraulic modelling to define the extent of Work No. 1 on the **Works Plans** [APP-009], the relocation of an On-Site 132kV Substation, the exclusion of Solar Stations from Flood Zone 3a and 3b areas (with the exception of the Gotts catchment) and the specification of flood mitigation measures within the **Design Parameters** (Doc Ref. 7.4 Rev 2). A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under discussion
3.2	EA8 EA9	Consideration of flood defence assets and Crowland and Cowbit Washes Flood	There is insufficient consideration of EA flood defence assets. Inadequate recognition of the Crowland and Cowbit Washes as a designated large raised reservoir under the Reservoirs Act 1975. The operation of the Washes and their interaction	The Applicant has submitted an updated **FRA** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) at Deadline 1 to provide further detail on the EA flood defence assets and the Crowland and Cowbit Washes designated large raised reservoir located near the	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Storage Reservoir	with fluvial and tidal defences is not clearly represented. Inadequate consideration of key aspects such as proximity of development to the reservoir embankments, required standoff distances, and maintenance/access requirements. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Scheme. As set out within Table 3-1 of this SoCG, the Applicant has made updates to the Application documents at Deadline 1 to provide an 8m buffer from the EA's land ownership boundary within Land Parcel A and to provide an access to the EA for the maintenance of the Flood Storage Reservoir. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
3.3	EA10	Consideration of tidal flood risk	There is inadequate understanding of tidal flood risk. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has revised the **FRA** (Doc Ref. 6.3 Rev 2) at Deadline 1 to provide further detail on the tidal flood risk to the Grid Connection Route. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has also been updated accordingly. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
3.4	EA11	Sensitivity testing for climate change.	Inconsistent approach to sensitivity testing for climate change. The H++ sea level rise scenario has been correctly used as a sensitivity test in accordance with guidance to consider a credible maximum scenario. However there is no	The Applicant notes that the EA advised during pre-application engagement that the breach assessment for the River Welland should be undertaken using the 0.1% Annual Exceedance Probability (AEP) event with the	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			equivalent assessment of a credible maximum scenario for peak river flows. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Higher Central climate change allowance (28%) for the maximum flood event (effectively the Credible Maximum Scenario event). In addition, the **FRA** (Doc Ref. 6.3 Rev 2) considers the 0.1% AEP event plus climate change for the South Holland Main Drain and Postland Catchment. In light of this requirement for the River Welland, and to ensure consistency in the assessment methodology, the Applicant considered it appropriate to apply the Higher Central climate change allowance to the South Holland Main Drain and the Postland Catchment assessments. This approach is consistent with the methodology agreed with the EA for the River Welland assessment. A full response is provided in the **Relevant Representations Report** (Doc Ref. 8.5).	
3.5	EA12 EA13	Development in Flood Zone 3b.	The proposal includes development within Flood Zone 3b (functional floodplain), which is contrary to national policy as set out in EN-1 National Policy Statement (NPS) paragraph 5.8.4. Further evidence should be provided to	During previous pre-application engagement with the EA, it was indicated to the Applicant that the proposals for development in the Gotts catchment may be acceptable, if the Exception Test is met, demonstrating that	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			demonstrate the application of the Exception Test. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	the infrastructure cannot reasonably be located elsewhere, 600mm freeboard is provided for solar stations, floodplain function would not be impeded and overland flow velocities would not damage or cause debris blockage. The **FRA** (Doc Ref 6.3 Rev 2) has been updated at Deadline 1 to more clearly set out why Flood Zone 3b cannot be avoided in the Gotts catchment. In summary, it has not possible to locate proposed infrastructure outside of Flood Zone 3b without either acquiring additional land (noting surrounding land north of South Holland Main Drain is also within Flood Zone 3b) or removing these land parcels from the Solar Development Area altogether, which would reduce the generating capacity of the Scheme. The proposed infrastructure within Flood Zone 3b has been designed to remain operational at times of flood, with 600mm freeboard provided for solar stations, and it does not materially increase flood risk or adversely affect the operation or function of the functional floodplain. As such, the	

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				residual effect is considered to be acceptable and proportionate. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
3.6	EA14	Bunding and flood storage provision.	A considerable amount of bunding is proposed around infrastructure located within the floodplain. The extent, layout, and function of these bunded areas are not clearly defined making it difficult to assess any cumulative impact. Limited consideration has been given regarding whether compensatory storage or greater flood storage provision would be appropriate given the scale and number of bunded areas. Maintenance requirements and long-term performance of the bunds are not addressed. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The **FRA** (Doc Ref. 6.3 Rev 2) has been updated at Deadline 1 to clarify where bunding or a flood defence wall would be required to protect the Scheme's infrastructure, the worst-case flood event against which the flood protection requirements have been assessed, and the associated freeboard allowances. Bunding (or a flood defence wall) is proposed for On-Site Substations in Parcels A, B and C, the BESS compound, selected solar stations and the Cable Sealing End Compound (CSEC) South to manage residual flood risk associated with the assessed flood events. Hydraulic modelling completed for the Scheme considered bunding around the On-Site Substations and all Solar Stations for a worst-case assessment (see modelling assumptions in **FRA Annex B** (Doc Ref. 6.3	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				Rev 1)), using the maximum bund width. As such, the depth change volume assessment reported in the **FRA** (Doc Ref. 6.3 Rev 2) accounts for the possible worst-case bunding, whilst in practice some of the Solar Stations can also be raised on plinths instead. The flood depth change assessment demonstrates that the change is minimal and results in no significant effects. The **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide additional discussion on the assessment of impacts on flood risk from the proposed bunds. Detailed design information of the bunds, including the height of bunds, inspection requirements and long-term maintenance arrangements, will be developed during the detailed design stage post-DCO consent. The commitment for inspection requirements and long-term maintenance arrangements to be set out has been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) at Deadline 1. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	

3.4. Hydraulic Modelling

Table 3-4 Hydraulic Modelling

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
4.1	EA15 EA16 EA17	Design event	Design event used for volume loss calculations is unclear. Design event scenario for bund wall heights in table 5-4 is not clear. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The **FRA** (Doc Ref 6.3 Rev 2) has been updated at Deadline 1 to clarify the design events used for volume loss calculations and the specification of flood mitigation parameters, including the height of bunds or flood defence walls. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
4.2	EA18	Assessment of Solar PV Support Panels in volume loss calculations.	It is not clear whether solar PV support panels are included in the assessment of volume losses for the Gotts Catchment. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant confirms the Scheme has assessed volume loss from solar PV panel legs across all four Parcels in the Solar Development Area, including the Gotts catchment. The **FRA** (Doc Ref. 6.3 Rev 2) has been updated at Deadline 1 to clarify this. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
4.3	EA19	Confirmation of flood	Conflicting information with respect to flood defence standard of protection.	The **FRA** (Doc Ref 6.3 Rev 2) has been reviewed and updated at Deadline 1 to ensure that the level of	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		defence mitigation	Conflicting information with regards to mitigation. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	protection provided by the River Welland flood defences is described consistently throughout the report. In addition, the **FRA** (Doc Ref 6.3 Rev 2) has been updated to clarify the flood mitigation measures embedded within the Scheme's design. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
4.4	EA20	Sensitivity test of the credible maximum tidal scenario (H++)	A sensitivity test for the credible maximum tidal scenario (H++) has not been undertaken in line with guidance. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has prepared a new **FRA Annex E** (Doc Ref. 6.3) to set out the sensitivity test for the credible maximum tidal scenario (H++). A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
4.5	Additional Matter	Review of Hydraulic Modelling Files	Comments were received from the EA on the River Welland, South Holland and Postland Hydraulic Modelling files.	The Applicant is in the process of reviewing these comments and preparing a response to the EA to provide a clarification in response to the comments received.	Under Discussion

3.5. Groundwater and Contaminated Land

Table 3-5 Groundwater and Contaminated Land

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
5.1	EA21	Contaminated land assessment	The conclusions of ES Appendix 5-4: Contaminated Land Assessment [APP-174] and ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension [APP-175] have not been noted or referenced in ES Chapter 5: Agriculture and Soils [APP-056]. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	As explained within Table 5-1 of **ES Chapter 5: Agriculture and Soils** [APP-056], an assessment of likely significant effects associated with contaminated land is scoped out of the EIA on the basis that the Preliminary Risk Assessments included within **ES Appendix 5-4: Contaminated Land Assessment** [APP-174] and **ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension** [APP-175] demonstrate that no significant effects are likely to occur with the implementation of standard industry practice measures. Standard industry practice measures to minimise risks associated with contaminated land have been incorporated within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), and **ODEMP** (Doc Ref. 7.12 Rev 1). As such, no further assessment is presented within **ES Chapter 5: Agriculture and Soils** [APP-056]. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
5.2	EA23	Unexpected contamination protocol	The unexpected contamination protocol does not include the need to contact the Local Authority and Environment Agency in the event contamination is identified. It does not mention the need to follow our Land Contamination Risk Management (LCRM) guidance. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The requirements to contact the Local Authority and Environment Agency and to follow Land Contamination Risk Management (LCRM) guidance in the event that contamination is identified has been included in the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) at Deadline 1. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
5.3	EA22	Risks to groundwater.	The mitigation measures for trenchless crossings do not consider risks to groundwater. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Table 3-7 of the **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated at Deadline 1 to reference groundwater as a receptor for potential impacts from trenchless crossing construction. However, as summarised within Table 11-1 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and within **ES Appendix 1-2: EIA Scoping Opinion** [APP-167], Table 3.4 ID Ref 3.4.1, the Planning Inspectorate agreed at scoping stage that groundwater aquifers were to be scoped out of further assessment in the ES due to the presence of unproductive superficial and bedrock strata.	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				Trenchless crossing works will take place under the use of standard and good practice mitigation measures for minimising risk to controlled waters, which includes both surface waters and any groundwater. This is noted within Table 3-7 Hydrology and Flood Risk of the **OCEMP** (Doc Ref. 7.10 Rev 2). A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	

3.6. Aquatic Ecology and Fish

Table 3-6 Aquatic Ecology and Fish

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
6.1	EA24 EA25 EA26 EA27 EA28 EA29	Fish scope of assessment.	We are not satisfied that impacts to fish can be scoped out of the Environmental Statement and Water Framework Directive (WFD). The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 has not been included. Fish are not mentioned as a potential receptor to impacts from fragmentation/ barriers to dispersal (e.g. from culverting and open-cut trenching of watercourses). There is the risk of any discharge pipes from swales to watercourses becoming an attractant for European eel, resulting in entrapment.	**ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) (Table 3-3) has been updated at Deadline 1. This now screens in the Grid Connection Route, and impacts to fish and aquatic ecology have also been assessed. **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) has been updated to include an assessment of impacts on fish for watercourse crossings across permanently wet watercourses on a precautionary basis. In addition, **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1) has been updated to identify which watercourses subject to crossings are likely to be permanently wet or seasonally wet. The lack of fish surveys has been included within the limitations section of the updated **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) with an explanation as to the decision process for this. The absence of surveys however is	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	not considered to affect the assessment findings. The majority of the drains/ ditches where watercourse crossings are proposed had only low or no levels of water present during surveys and as such, would be of limited value/use by fish. Where there is permanent water present, the timing of works (in order to avoid spawning periods) and construction methods will be considered for detailed design, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). The **OCEMP** (Doc Ref. 7.10 Rev 2) has also been updated at Deadline 1 to include a firmer commitment to the use of clear span structures for crossings across any permanently wet watercourses. Pipe connections from swales to watercourses have been minimised, with surface water from the Solar Development Area's swale -based drainage system draining into local receiving watercourses via a new open green ditch, where applicable, minimising the risk of eel entrapment. This is secured within **ES**	

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				Appendix 11-4 Outline Drainage Strategy [APP-227]. In addition, **ES Appendix 9-1: Ecology Legislation, Policy and Guidance** (Doc Ref. 6.3 Rev 1) has been updated to include legislation relevant to the assessment of impacts on fish and the requirements of these legislation have been considered as part of the impact assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1). A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
6.2	EA30	Watercourse habitat mitigation	Further detail is required regarding the proposed mitigation for open-cut trenching of watercourse crossings. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The design of the watercourse crossings will be confirmed at the detailed design stage, in accordance with the design principles and parameters secured through the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OCEMP** (Doc Ref. 7.10 Rev 2). The wording within the **OLEMP** (Doc Ref. 7.16 Rev 1) has however been reviewed and updated at Deadline 1 to include details of	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				the habitat creation commitments to all banksides where crossing points are required – specifically, 15m habitat creation either side of all crossing points, subject to agreement with the Internal Drainage Boards (IDBs). The mitigation for water voles has been discussed and agreed in principle with Natural England as part of consultation meetings, as can be evidenced from the **Statement of Common Ground with Natural England** (Doc Ref. 8.13). A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	

3.7. Geomorphology

Table 3-7 Geomorphology

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
7.1	EA31	Definition of 'temporary'.	The WFD impacts of 'temporary' watercourse crossings may be underestimated. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to state that temporary crossings will be in place for up to four years, the construction of which has been assessed in Section 11.8. Mitigation has been committed to on the design of culverts and on channel reinstatement, as set out within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and secured through **OCEMP** (Table 3-7) (Doc Ref. 7.10 Rev 2). The WFD Assessment within **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) concludes that any impacts associated with temporary and permanent crossings will be localised, mostly on minor drainage channels within the WFD water body catchments, and not significant at the WFD water body scale. The Scheme would therefore not cause deterioration in the status of any WFD water body or prevent the water bodies achieving target status, noting the embedded environmental mitigation. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
7.2	EA32	Culvert design.	The use of pipe culverts should be restricted to those watercourses that are predominantly dry throughout the year. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and the **OCEMP** (Doc Ref. 7.10 Rev 2) state that where possible existing accesses will be used unmodified or slightly modified as required. Where new temporary access crossings are needed the design of each crossing will be addressed on a 'case by case' basis at detailed design with flexibility retained for either clear span structures or culverts. Where culverts are proposed the design will ensure that they are sized to not impact on flow conveyance and ensure capacity for peak flow rates, among other factors to minimise environmental impact. An assessment for each water feature based on assumed reasonable worst-case parameters for a proposed structure is presented within Table 11-9 and Table 11-10 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). A pipe culvert was assumed given the desire to be able to easily remove the structure following completion of construction works. However, as mentioned above, flexibility is retained in the DCO for both clear-span or culvert structures, with the latter not necessarily a pipe. The majority of watercourses are low grade and mainly managed drains that are only seasonally wet and have very limited coarse sediment transport. As a result there is limited potential for impacts on the water environment through throttling of flows and interference with sediment movement. Overall, the design of temporary access crossings will be agreed with the IDB, where required, depending upon	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				ownership of the asset, as managed by protective provisions included within the **Draft DCO** (Doc Ref. 3.1 Rev 2). Furthermore, the **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated at Deadline 1 to include a firmer commitment to the use of clear span structures for crossings across permanently wet watercourses, where practicable and safe to do so, except where the crossing forms part of a public highway access point (bellmouth access) or where an alternative crossing solution is justified through the detailed design process. In such cases, it must be demonstrated that there would be no significant adverse effects on fish. The Environment Agency would be consulted as part of the detailed design process, and suitable mitigation measures incorporated into the crossing design. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
7.3	EA33	Watercourse crossing technique.	Further detail is required regarding the construction and reinstatement of open-cut watercourse crossings. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	For the intrusive crossings, Table 3-7 within the **OCEMP** (Doc Ref. 7.10 Rev 2) sets out the potential risks and mitigation measures for the construction of open cut watercourse crossings. Measures which are secured within the **OCEMP** (Doc Ref. 7.10 Rev 2) include a Pre-works Hydromorphological and Riparian Corridor Survey which will be undertaken to record channel features/habitats and provide the baseline, against which reinstatement will be designed. Reinstatement will seek to return the watercourse to a condition as found as a minimum whilst also considering	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				opportunities for enhancement, which would be subject to agreement with the IDB. Furthermore, during reinstatement, any subsequent improvements to the watercourse that have occurred upstream or downstream by other initiatives can be taken into account, although as this is within the construction site any changes in baseline are unlikely. The **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated at Deadline 1 to clarify measures to be adopted for the construction and reinstatement of open cut watercourse crossings. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	

3.8. Water Resources

Table 3-8 Water Resources

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
8.1	n/a	Water Resources	The Applicant has indicated that water supply will not come from Anglian Water and will be tankered from 3rd parties. More detailed assessment of later usage will be required, and water tanker movements should be included in traffic assessments. This intended approach is outside the remit of the Environment Agency. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Scheme is not proposing connection to the mains water supply for construction or decommissioning. During operation, mains supply is only proposed for the operational water supply of site offices within the On-Site Substations, accommodating up to 10 site staff, subject to agreement with Anglian Water, or otherwise a third party commercial source will be used. All other construction, operational and decommissioning water supply is to be sourced from commercial suppliers and a connection to a mains supply or water abstraction does not form part of this DCO Application. Water tanker movements have been accounted for in the development traffic estimates assessed in **ES Chapter 15: Traffic and Access** [APP-066]. The approach to the water supply is set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1).	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				A Water Supply Strategy will be prepared for Deadline 2, ahead of which a meeting is scheduled with the Environment Agency and Anglian Water to discuss the format and contents of the document.	

3.9. Water Quality

Table 3-9 Water Quality

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
9.1	EA34	Water quality monitoring	Water quality monitoring needs to be developed further to ensure risks to the environment are adequately managed. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The **OCEMP** (Doc Ref. 7.10 Rev 2) commits to the production of a detailed Water Management Plan (WMP), which has been agreed as a suitable approach on other similar NSIP schemes. The WMP (which will be produced post consent) will also include details of pre, during and post-construction water quality monitoring. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
9.2	EA35 and EA36	Watercourse receptor importance and water quality baseline.	When considering watercourse receptor importance, it is unclear how downstream watercourses have been included in assessment. Further baseline information should be presented. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) paragraphs 11.4.1 to 11.4.7 outline the approach to the study area for the assessment. **ES Appendix 11-5: Hydrology and Flood Risk Baseline** [APP-233], Table 1-3 and Table 1-8 provide further baseline information. The Water Management Plan (which will be produced post consent), as outlined in the **OCEMP** (Doc Ref. 7.10 Rev 2) will require pre, during and post-construction water quality monitoring. The monitoring as part of the pre-construction would include as a minimum pH, temperature, conductivity, dissolved oxygen and turbidity.	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	
9.3	EA37	Foul water strategy.	Foul water strategy for construction and decommissioning should be clarified. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The **OCEMP** (Doc Ref. 7.10 Rev 2) and **ODEMP** (Doc Ref. 7.12 Rev 1) state that foul drainage during construction and decommissioning will be dealt with by self-contained cesspits and will be regularly emptied by a waste management contractor. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) have been updated at Deadline 1 to refer to these arrangements for foul drainage during construction and decommissioning. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion
9.4	EA38 EA39 EA40	Request for further detail of mitigation measures.	Further detail is required in the accompanying outline management plans (oCEMP, oOEMP, oDEMP) regarding key pollution prevention measures. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has made updates to the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) at Deadline 1 to clarify mitigation measures in accordance with the EA's detailed comments raised in its relevant representation. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
9.5	EA41 EA42 EA43 EA44	Installation and Management of BESS and Substations.	Further detail is required regarding the installation and management of the BESS and substations. The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has set out further details regarding the installation of, and management of fire risk at, the BESS and On-Site Substations within the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5). Further details with regards to the management of firewater at the BESS Compound are set out within the **ES Appendix 11-4 Outline Drainage Strategy** [APP-227] and **the Outline Battery Safety Management Plan** [APP-284]. With regards to the On-Site Substations, modern substations are designed in accordance with relevant UK standards and incorporate multiple layers of protection including electrical protection systems, fault detection, automatic isolation, fire separation distances, oil containment systems and routine inspection and maintenance. Table 3-8 of the **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated at Deadline 1 to clarify measures to be implemented with the detailed design and emergency planning procedures of on-site substations to prevent contaminated firewater runoff being released from the site during an incident. A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	Under Discussion

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
9.6	Points for consideration	Bunding (pollution) of electrical equipment.	Relevant guidance should be reflected in accompanying outline management plans (oCEMP, oOEMP, oDEMP) and WFD Report to support pollution prevention The EA will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The Applicant has made updates to the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), **ODEMP** (Doc Ref. 7.12 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) at Deadline 1 to reflect compliance with relevant guidance for pollution prevention. Where transformers and other electrical equipment are oil filled, these will comply with the Control of Pollution (Oil Storage) Regulations[3]. As such they will contain bunding to hold at least 110% of the maximum capacity of the transformer or other electrical equipment. Table 3-7 in the **OCEMP** (Doc Ref 7.10 Rev 2) and Table 3-8 in the **OOEMP** (Doc Ref 7.11 Rev 1) state that fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers, which constitutes 10% more capacity than is strictly needed).	Under Discussion

[3] HM Government (2001) The Control of Pollution (Oil Storage) (England) Regulations 2001. Available at: https://www.legislation.gov.uk/uksi/2001/2954/contents [Accessed 21/09/2026]

Ref	EA Ref.	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
				A full response is provided in the **Relevant Representations Report** at Table 3.5 (Doc Ref. 8.5).	

4. Signatures

4.1.1. This SoCG is agreed between the following:

Duly authorised for and on behalf of Meridian Solar Farm, the Applicant	Name Job Title Date Signature
Duly authorised for and on behalf of the Environment Agency	Name Job Title Date Signature