Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.13 Statement of Common Ground with Natural England

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] 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]

1.1.3. This document relates to matters between the Applicant and Natural England. It has been prepared jointly by the Applicant and Natural England, and Natural England has reviewed the Applicant's position as set out. It confirms to the Examining 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
10/03/2024	Online Meeting	The Applicant introduced the Scheme and provided an overview to Natural England.
08/04/2024	Online Meeting - Discretionary Advice Service (DAS)	<u>Ecology and Biodiversity</u> The scope of the ornithological surveys was discussed. Natural England expressed concern about the potential of the Scheme to affect functionally linked land associated with Internationally Important Wildlife Sites and/or Species of Conservation Concern, and potential impacts on nearby population of cranes. <u>Agriculture and Soils</u> The methodology of the initial Agricultural Land Classification (ALC) surveys, ongoing at the time of the meeting, was shared with Natural England. Agreement with Natural England on methodology for initial ALC surveys completed within the Solar Development Area. Agreement that the results from the initial ALC surveys would be shared on completion.
05/08/2024	Email	Initial ALC survey report issued to Natural England following the completion of the reconnaissance surveys within the Solar Development Area.

Date	Form of Engagement	Details
04/09/2024 17/10/2024	Online Meetings	Ecology and Biodiversity Further discussion around scope of ornithological surveys, including desk study and engagement with stakeholders regarding common crane; diurnal vantage point surveys 2024/2025 and nocturnal vantage point surveys 2024/2025. Agriculture and Soils Natural England confirmed receipt of the initial ALC survey report and that they held no specific concerns with the report or its findings. The approach to further surveys within the Solar Development Area Inter-Array Connections and Grid Connection Route was discussed.
15/04/2025	Email	Technical note on the detailed ALC survey approach issued to Natural England for comment.
24/04/2025	Online Meeting	Meeting to discuss the technical note on the detailed ALC survey approach. There was agreement on survey method and intensity for Parcels A, B, C, D. Natural England's advice was expressed for surveying the entirety of the Grid Connection Route and Inter-Array Connections.
28/05/2025	Online Meeting	Review and discussion of the HRA Evidence Plan.
29/07/2025	Email	Issue of detailed ALC survey results to Natural England, together with a comparison against the previous reconnaissance survey results.
05/08/2025	Online Meeting	Meeting to discuss Natural England's statutory consultation comments, collision risk analysis and to provide an update on ecology surveys.
09/09/2025	Email	Natural England issued an advice letter, providing their comments on the detailed ALC survey results.

Date	Form of Engagement	Details
01/10/2025	Email	Updated HRA Evidence Plan issued to Natural England.
30/10/2025	Online Meeting	Applicant presented the approach to collision risk modelling, outcomes of initial model analysis, limitations and alternatives, potential mitigation options and approach to the consideration of in-combination effects.
20/11/2025	Online Meeting	Applicant presented a summary of the water vole survey findings, queried the approach to licensing and the requirement for a letter of no impediment. Natural England subsequently confirmed that no draft water vole license needs to be submitted with the DCO Application.
05/12/2025	Email	Natural England confirmed that the unattributed Site of Special Scientific Interest (SSSI) Impact Risk Zone adjacent to the Site is likely to relate to the Nene Washes SSSI and The Wash SSSI (and associated Special Protection Area (SPA)/Ramsar Designations).
30/01/2026	Online Meeting	The Applicant presented a summary of how comments received on the detailed ALC survey had been addressed and presented a summary of the initial agriculture and soils assessment results.
09/07/2026	Online meeting	Meeting to discuss principal areas of concern within Natural England's Relevant Representation as well as the structure of the SoCG.
14/08/2026	Online meeting	Joint meeting with Lincolnshire County Council to discuss comments received on the ALC survey and the agriculture and soils assessment.
20/08/2026	Online Meeting	Regular catch up call to discuss the preparation of the SoCG.

3. Statement of Common Ground

3.1. Internationally Designated Sites

Table 3-1: Areas of Discussion with Natural England – Internationally Designated Sites

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE1	Identification of sites	NE considers that all relevant European Sites have been identified within the HRA Report [APP-217] and agrees that consideration of Barnack Hills and Holes SAC and Orton Pit SAC is not necessary.	The Applicant agrees with NE's position.	Agreed
NE2	HRA Evidence Plan	NE has agreed an evidence plan for the project's HRA via our Discretionary Advice Service (DAS) (Appendix 2 of HRA Report [APP-217]]. NE considers relevant desk data and survey has been carried out in order to inform the HRA.	The Applicant agrees with NE's position.	Agreed
NE3	IIWS Qualifying Species	NE requests that any table listing species (e.g. primary Focal Species or Tables 3.2 of both Wintering Bird Survey Reports) acknowledges that any wetland bird would be considered an Internationally Important Wildlife Site (IIWS) qualifying species for The Wash (especially if it is a record/ observation from within typical range for The Wash).	The supporting wintering bird reports (**ES Appendices 9-4 to 9-6** (Doc Ref. 6.3 Rev 1) have been updated for Deadline 1 to acknowledge that any wetland bird species would be considered to form part of the Waterbird Assemblage for The Wash.	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.		
NE4	Stage 1 - Impact Pathways Considered	HRA Report [APP-217] Table 4 identifies relevant impact pathways on IIWS based on the Site Improvement Plans, Impact Risk Zone (IRZ) criteria and other known sensitivities. NE considers that all relevant impacts from the Scheme have been identified for further consideration in the screening assessment. Whilst impacts to Functionally Linked Land (FLL) have been considered, Table 4 of the HRA Report [APP-217] should specifically reference noise and visual disturbance on birds using FLL. NE has made further comment on this at NE7.	The Applicant agrees with NE's position with regards to the identification of relevant impact pathways. Agreement on noise and visual disturbance impacts on FLL is set out under NE7 below. **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been updated for Deadline 1 to address relevant points, including additional detail in Table 4 regarding impact pathways on FLL.	Agreed
NE5	Stage 1 - Identification of FLL	Whilst NE concurs that the four areas the Applicant has identified as FLL are likely to constitute FLL, the method used to reach this conclusion, and to rule out any other areas of FLL within the order limits or in close proximity, is unclear.	An updated **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been submitted at Deadline 1 to clarify the process to determine FLL. The Applicant has considered areas where SPA species occur as potential FLL but only determined areas to be FLL, where they provide functional value to the	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Further information should be provided regarding the process used to identify areas of FLL. Justification should be provided as to why none of the Order Limits have been considered as FLL and where this is not possible, additional FLL should be included for assessment. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	relevant SPA. To clarify the application of this process, additional detail has been provided within **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1), wherever SPA species have been recorded, to present the process of determining whether or not these locations are FLL, in line with the key considerations presented in NE's response, but the process aligns with NE's stated expectations in identifying and assessing all areas with potential to provide functional value in relation to relevant species. The assessment of potential FLL did not identify any of these areas within the Order limits as supporting significant function in relation to the relevant species, so no FLL is considered to fall within the Order limits. .	
NE6	Stage 1 - Direct Loss of FLL	Alongside the information requested at NE5, further reasoning should be provided to justify the statement that there will be no direct land-take within FLL. Further information should be provided to demonstrate how survey results have been used to inform Scheme design to avoid impacts to FLL.	Where SPA species occur within the Order Limits, the determination of functional value in relation to the SPA has been detailed within the updated **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 1) at Deadline 1. Effects in relation to FLL would only be considered, if there were impacts to areas which were identified as being of functional value. For clarity, **ES Appendix 9-14: HRA**	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	**Report** (Doc Ref 6.3 Rev 1) submitted at Deadline 1 has amended the use of "*potential* areas of FLL" with "*identified*' areas of FLL" as at this stage of report, the potential areas (i.e. those with suitable habitat where SPA species were recorded) have been assessed to determine if they are considered to have functional value in relation to the SPA. A full response is provided in the **Relevant Representations Report** at Table 3.11 (Doc Ref. 8.5).	
NE7	Stage 1 - Noise and Visual Disturbance to FLL	There is no assessment of noise or visual disturbance impacts within the HRA. It is unclear how noise/disturbance impacts to the identified areas of FLL have been screened out. Three of the four areas lie directly adjacent to the Order Limits; so noise and visual disturbance in these areas would be expected during construction and decommissioning. NE advises that Likely Significant Effects from disturbance to FLL should be screened in, with further assessment of noise and visual disturbance	The Outline Construction Environmental Management Plan (**OCEMP)** (Doc Ref 7.10 Rev 2) and Outline Decommissioning Environmental Management Plan (**ODEMP)** (Doc Ref 7.12 Rev 1) have been updated to include specific reference to FLL and the measures that will mitigate potential effects arising from noise or visual disturbance, including timing of works, screening and buffers. These updated documents have been submitted at Deadline 1. **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been updated to screen these	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		being provided within the Appropriate Assessment. Further information should also be provided regarding the embedded measures being relied upon to reduce impacts from Noise and Visual Disturbance. Any additional mitigation measures required to avoid noise/visual disturbance effects during construction and decommissioning must be detailed in the oCEMP/oDEMP. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	impacts into the Appropriate Assessment so that the effects are assessed specifically taking account of these measures. Noise contours arising from peak potential disturbance events have been reviewed to provide further detail of where potentially significant effects could occur and the measures within the **OCEMP** (Doc Ref. 7.10 Rev 2) and **ODEMP** (Doc Ref 7.12 Rev 1) would need to be applied.	
NE8	Stage 1 - Predator Shadows	NE generally concur with the rationale concluding that there are no likely significant effects associated with predator shadows. Nonetheless, further consideration of impacts from a predator shadow effect may be necessary should any additional FLL be identified in closer proximity to the Order Limits. NE will review and provide an update on their position following a review of	Noted, and refers to the Applicant's position on NE5.	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		documents submitted by the Applicant at Deadline 1.		
NE9 & NE11	Stage 1 – Impacts on FLL for Otter & Direct impacts on Otter	NE agrees that likely significant effects on Otter from impacts to FLL and direct impacts can be ruled out. Embedded measures, such as those set out in CEMP Table 3-5 for Otter and Water Vole, are likely to avoid a significant effect on Otter associated with the Wash and North Norfolk Coast SAC.	The Applicant agrees with NE's position.	Agreed
NE10	Stage 1 - Direct impacts to species – Ornithology (collision)	NE welcomes the Applicant's approach to assessing collision risk, including the use of desk study hotspot and movement corridor data as supporting context rather than as the sole basis for conclusions. It also supports the decision not to rely exclusively on collision risk modelling, recognising the limitations and uncertainties of such models, particularly for overhead lines. Overall, NE concurs that likely significant effects from collision risk cannot be ruled out for The Wash SPA/Ramsar and Nene Washes Ramsar sites.	The Applicant agrees with NE's position.	Agreed
NE12	Stage 1 – Air Pollution	Natural England has produced 'Standard Advice for Air Quality Impacts in Nationally	Noted, no further response required.	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Significant Infrastructure Projects' and have no bespoke comment to provide with regard to air quality impacts.		
NE13	Stage 1 – Water Pollution	NE concurs with the HRA conclusion that likely significant effects from water pollution can be ruled out during construction and decommissioning. This is based on the implementation of best practice pollution prevention measures set out in Tables 3-6 and 3-7 of the oCEMP and oDEMP. NE also agrees that water pollution effects during the operational phase are unlikely.	The Applicant agrees with NE's position.	Agreed
NE14	Stage 1 – HRA Screening Conclusions	NE concurs with all of the Applicant's HRA Stage 1 screening conclusions, with the exception of impacts on FLL for Ornithology (See items NE5-8). NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Applicant's position to NE5-8 is provided in rows above.	Under discussion
NE15	Stage 2 - Direct impacts to species – Ornithology (collision)	NE disagrees with the statement that undergrounding of the route may have greater impacts to wintering birds foraging and roosting in the area than the currently proposed overhead cables, noting that the	The Applicant considers that it is not appropriate to rely on monitoring as mitigation to support the conclusions of the HRA and considers that the assessment and conclusion of no significant effect without it	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		overhead line introduces a permanent collision risk. Ultimately, the decision to use overhead cables instead of underground cables for the grid connection must be considered by the Secretary of State. NE supports the proposed use of line markers and agrees that the two identified high-risk collision areas should be fitted with them. However, because the section between these areas was not covered by Vantage Point surveys, NE recommends that a commitment should be made for a scheme of monitoring for collision along the length of the OHL to be undertaken during operation. Monitoring results should be used to assess actual collision risk against modelled predictions and inform future assessments, with additional line markers considered if collisions are recorded. This should also be secured within the DCO. Commitment must be made for the detailed design of line markers, including choice of model, frequency of use and exact locations, to be undertaken in consultation with Natural England.	is robust. While the viewsheds of the vantage points do not completely cover the entirety of the Grid Connection Route, the coverage and survey effort is reasonable and proportionate and provides sufficient representative data to inform the assessment. However, Table 3-5 of the Outline Operational Environmental Management Plan (**OOEMP)** (Doc Ref. 7.11 Rev 1) sets out that the diverters will be checked along with other overhead line checks, and replaced, as required. Year-1 post-installation monitoring and incident logging (diurnal/nocturnal Vantage Point checks, where appropriate) will be undertaken. Consultation on the detailed design of bird diverters with Natural England has been secured through the OOEMP (Doc Ref. 7.11 Rev 1).	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE recommends the detailed design of line marker deployment is secured within the DCO, including requirement for consultation with NE NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.		
NE16	Stage 2 – Direct impacts to species – Ornithology (collision) Collision Risk Modelling	NE generally agrees with the approach taken to the overall assessment of collision risk, which has considered desk data, survey results, local expertise and modelling outputs.	Noted, no further response required.	Agreed
		NE does not agree with the rationale provided for the use of the 'Alignment Factor', set out at paragraph 2.2.12 to 2.2.13 (APP-218). Nonetheless, given the significant uncertainties inherent in the whole process, the model outputs have served their primary purpose to identify the high-risk species and locations. This information has then been considered 'in the context of wider qualitative assessment' within the HRA and mitigation applied appropriately. Thus, whilst	Given the limited available data on collision rates for overhead lines, the alignment factor within **ES Appendix 9-15** [APP-218] allows for better representation of the relative collision risk, drawing on the Band collision model, which is more robustly tested. It is acknowledged that collision rates for wind turbines will be different to those for overhead lines, so the alignment factor is not intended to make the model outcomes match. It does, however, with significant degree of precaution, allow for the models	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Natural England does not agree with this alignment factor, we do not consider it would alter the outcome of the assessment. The Alignment Factor used in the model should be omitted, or further rationale and information regarding the parameters used in the model used to inform it could be provided. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	to be brought into a reasonable order of alignment.	
NE17	Stage 2 – In combination Assessment	NE acknowledges that the proposed Grimsby to Walpole and Weston Marsh to East Leicestershire (WMEL) overhead line schemes are not yet sufficiently advanced for detailed collision risk modelling, so a quantitative in-combination assessment cannot currently be undertaken. NE recommends that collision risk data associated with the Meridian project should be made available to the Grimsby to Walpole and WMEL projects to ensure they are able to carry out a full quantitative in combination assessment.	The Applicant agrees with NE's position. The Applicant agrees that the collision risk modelling data can be shared with NGET upon request.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE18	Appropriate Assessment Conclusions	Overall, subject to the detailed design of line markers and monitoring of collision, NE concurs with the conclusions reached regarding collision risk. However, it is advised that impacts to functionally linked land are considered within the Appropriate Assessment. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Applicant's position on these matters is set out in rows above.	Under discussion

3.2. Nationally Designated Sites

Table 3-2 Areas of Discussion with Natural England – Nationally Designated Sites

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE19	Identification of Sites	NE welcomes the extensive use of our Impact Risk Zones (IRZs) to identify potential impacts and considers all relevant SSSIs have been identified. NE welcomes the identification of all SSSIs as being of National Importance (Table 9-6).	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE20	Impact Assessment – Underpinning SSSIs	NE welcomes that all relevant SSSIs which underpin European designations have been identified and has no further advice regarding potential impacts to The Wash SSSI, the Nene Washes SSSI and Baston Fen SSSI. NE also welcomes that impacts to the Unattributed IRZ (centroid TF 3499 1700) have been considered in the ES.	The Applicant agrees with NE's position.	Agreed
NE21	Impact Assessment – Cowbit Wash	NE concurs with the assessment of impacts to Cowbit Wash SSSI in Table 9-14 that there is no potential for effects beyond those via Air Quality.	The Applicant agrees with NE's position.	Agreed

3.3. Designated Landscapes

Table 3-3 Areas of Discussion with Natural England – Designated Landscapes

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE22	Designated Landscapes	The Scheme is not located within, or within the setting of, any nationally designated landscapes. As a result, NE has no specific comments to make on the landscape implications of this development. For advice on wider landscape issues, NE refers to the	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		local planning authorities and other local bodies.		

3.4. Protected Species Licensing

Table 3-4 Areas of Discussion with Natural England – Protected Species Licensing

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE23 NE24 NE25	Water Vole Licencing Approach Other Protected Species Licencing Disapplication of Legislation	NE agrees with the proposed water vole licensing approach. No further licence need has been identified by the Applicant. NE welcomes the approach taken to avoid impacts as much as possible in line with the mitigation hierarchy. NE welcomes the wording in the draft DCO confirming that separate permits or licences required under other legislation must still be obtained.	The Applicant agrees with NE's position.	Agreed

3.5. Soils and Best & Most Versatile Land

Table 3-5 Areas of Discussion with Natural England – Soils and Best & Most Versatile Land

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
BMV1	Scheme design and avoidance of BMV land	While NE recognises the clear intention to minimise impacts on the highest quality agricultural land, it notes that some Grade 1 and 2 land will still be required for the Substation and Battery Energy Storage System (BESS). Justification for this land-take has been provided based on the routing of the Grid Connection and competing constraints with alternative solutions. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources and, as set out at NPS EN-3 paragraph 2.10.137, take into account the economic and other benefits of the best and most versatile agricultural land in their decision making.	The Applicant agrees with NE's position on the consideration of alternatives and design evolution with respect to Best and Most Versatile (BMV) land. Measures to minimise impacts on BMV land throughout the construction, operation and decommissioning phases of the Scheme are established and secured through compliance with the **Outline Soil Management Plan (OSMP)** (Doc Ref. 7.14 Rev 1).	Agreed
BMV2	ALC Survey Methodology – Solar Development Area	NE has worked with the Applicant during the pre-application period to agree an ALC survey methodology for the project.	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
BMV3	ALC Survey Methodology – Cable Corridor	The Applicant has not undertaken ALC survey of the Grid Connection Route; in the absence of survey data, the Applicant's ability to avoid the highest quality land through scheme design has been limited. However, they have instead: • Committed to undertaking ALC survey of the cable route post-consent, to inform the final Soil Management Plan, and • Taken a worst-case scenario approach for the cable route within the ES, considering them to be entirely ALC Grades 1 and 2. Whilst NE's advice remains that an ALC survey of the full Order Limits should be carried out pre-consent, in this instance it is considered unlikely to make a material difference to our advice or the outcome of the decision making process.	The Applicant acknowledges NE's position regarding the need to minimise impacts on BMV land. However, in the specific context of the Scheme, the influence of ALC grade on both the alignment and micro-siting of the Inter-Array Connections and Grid Connection Route is inherently constrained. A detailed soil survey of the Inter-Array Connections and the Grid Connection Route is proposed post-DCO consent once detailed design has been undertaken, as set out within Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1). This reflects accepted practice on comparable NSIPs where the precise alignment or construction corridor cannot be fixed prior to consent. Examples include the Tillbridge Solar Project, Sunnica Energy Farm and Yorkshire GREEN, where detailed soils data for linear elements were to be completed following design refinement. The approach adopted for the Meridian Scheme is therefore consistent with proportionate, design-led practice for NSIPs that include linear infrastructure elements. As a worst-case assumption within **ES Chapter 5: Agriculture and Soils** (Doc Ref.	Not Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			6.1 Rev 1), the entirety of the Grid Connection Route and the Inter-Array Corridors have been assumed to comprise BMV land and have been assigned very high sensitivity. It is noted that NE recognizes that a survey is unlikely to make a material difference to the decision making process.	
BMV4	ALC Survey Methodology – Incomplete Survey	Natural England notes that some land remains unsurveyed within the Solar Development Area due to access constraints and UXO risk. It considers that additional justification is needed for extrapolating survey results to these areas and does not regard UXO as a barrier to undertaking ALC surveys where appropriate mitigation is applied. Unsurveyed areas should be subject to ALC survey where accessibility allows, even if this must be post consent, to ensure the evidence is available to inform the final Soil Management Plan. Rationale should be provided for any remaining un-surveyed areas across the site. The oSMP, secured by DCO Requirement 19, must make clear	Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1) has been updated at Deadline 1 to include a commitment for additional ALC survey to be undertaken in areas of the Solar Development Area that were inaccessible during the pre-application surveys, in order to inform the preparation of the detailed Soil Management Plan. Section 5.5 addressing Assessment Assumptions and Limitations of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) has been updated at Deadline 1 to acknowledge that 100% survey coverage of the Solar Development Areas was not possible and how data has been applied to the areas not surveyed. It is noted that the areas at elevated risk of UXO are associated with World War II	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		commitment for the completion of the ALC dataset. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	aircraft crash sites and therefore require an excavation license from the Ministry of Defence under the Protection of Military Remains Act 1986 (POMRA), prior to any intrusive works, including ALC survey, can be undertaken within these areas. A POMRA license would be applied for post-DCO consent, as set out within the **Outline Archaeological Mitigation and Management Strategy (OAMMS)** (Doc Ref. 8.7). Assessment assumptions and limitations in Section 5.5 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) have been updated at Deadline 1 accordingly.	
BMV5.1	ALC Survey Findings - Mapping	NE continues to have concerns with the mapping of ALC grades across the Order Limits. Whilst NE agrees that there may be isolated augers of differing ALC grades which would not be reasonably practicable to be managed in an isolated way (APP-173, para 3.5.23.5.4), and as such, it is not helpful to map isolated auger cores of differing ALC grades, we do not agree that a field average approach should be taken when mapping ALC grade.	The Applicant notes that the assessment presented within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) is based on the auger-by-auger point mapping as this presents a worst-case assessment, and the field averaged results have been presented for information only for consistency with information presented during pre-application stages.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Applicant's full response is provided in the **Relevant Representations Report** (Doc Ref. 8.4) submitted at Deadline 1.	
BM5.2	ALC Survey Findings - Mapping	No attempt has been made to use or integrate existing data from the semi-detailed survey undertaken by Land Research Associates, nor is there any discussion regarding the Post 1988 ALC survey available for part of the site. NE would expect discussion to be provided regarding the discrepancies between the results. This would be particularly useful where detailed survey was not undertaken (i.e. inaccessible areas) or where grading differs significantly. NE advises that, following updates to soil wetness calculations and ALC gradings (see item BMV6) an updated ALC map should be	The reconnaissance survey undertaken by Land Research Associates (LRA)[3] and the Post 1988 ALC survey for Postlands Estate[4], were reviewed, however, they have not been used to determine the ALC grade of the land within the Solar Development Area. Further information with regards to a comparison of the survey results has been included within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) submitted at Deadline 1. Applicant's full response is provided in the **Relevant Representations Report** (Doc Ref. 8.4) submitted at Deadline 1.	Under Discussion

[3] LRA (2024) Meridian Solar Farm. PEIR Volume III Appendix 9-1: Agricultural Land Classification Survey Report – PV Area. Available at: https://meridiansolarfarm.co.uk/wp-content/uploads/2025/stage-two-consultation/peir-volume-iii/0901%20-%20PEIR%20Volume%20III%20Appendix%209-1%20Agricultural%20Land%20Classification%20Survey%20Report%20PV%20Area.pdf [Accessed 28/07/2026]

[4] Resource Planning Group (1992) Agricultural Land Classification detailed Post 1988 ALC survey, Crowland, Postlands Estate (ALCC05791). Available at: https://publications.naturalengland.org.uk/publication/5590632018477056 [Accessed 28/07/2026]

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		prepared in line with the requirements of the BSSS Working with soil competencies (WWS Complete Competencies.pdf), which sets out the expectation for mapping soil units and ALC grades. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.		
BMV6	ALC Survey Findings – Wetness Class Calculation	Wetness Class Calculations should be updated across both of the ALC reports to reflect the calcareous soils, with ALC gradings subsequently amended to reflect this and remapped as per item BMV5. The Assessment of Effects to BMV land at ES Chapter 5 must then be updated to reflect any changes in ALC grading. NE will review and provide an update on their position following a review of	Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidelines[5]. **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) have been updated at Deadline 1 to clarify where both, negative and positive results, were recorded. Calcareous conditions were not uniformly present across the clay soils. Positive reactions were recorded only in limited and spatially discontinuous locations, with most observations indicating non-calcareous conditions below approximately 25 cm depth. This is consistent with the	Under discussion

[5] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448 [Accessed 28/07/2026]

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		documents submitted by the Applicant at Deadline 1.	published soil information, which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent. As the calcium carbonate of most samples was not greater than 1%, the other considerations within Table 6 of the ALC guidelines do not apply. On this basis, the Applicant does not consider that the ALC mapping needs updating.	
BMV7	ALC Survey Findings – Soil Auger Records	Soil bore logs provide a detailed log of soil properties. However, it is unexpected to see the same soil properties, including soil horizon depths; and soil colours across large swathes of land as shown in Appendix II. NE notes that the soil pit photograph appended to the ALC report for parcels A and D (APP-172) 'soil type 2 PIT', clearly shows a high topsoil depth variability across a relatively small area, suggesting topsoil depths across the wider sites would also be more variable than suggested by the auger	Auger borehole logs were recorded in accordance with the Field Survey Handbook[6] using a standardised descriptive framework to ensure consistency in the recording of soil characteristics across the survey area. The occurrence of identical or near-identical horizon depths at adjacent observations is not unusual where soils have developed with horizon boundaries recorded during ALC surveys typically assigned to the nearest integer depth within a homogenous soil unit.	Under discussion

[6] Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448 [Accessed 28 July 2026]

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		bore log. The photographs, whilst welcome, lack the information required to make them useful. There are no coordinates or direction shown for the photos, nor soil bore numbers. Whilst only two soil types were identified across the 2 sites, it would be expected that due to the size of these sites, and the fact they are spatially isolated from each other, more than 2 pits would be explored to confirm soil structural properties. NE does not request any further action on this point, however, would like to note this for PINS' consideration as a further concern regarding the robustness of the ALC survey. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	The ALC survey reports (**ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1)) presented generalised soil profiles for each soil type to avoid unnecessary repetition where profile characteristics were found to be consistent across the survey area. The full soil pit logs and descriptions have been provided within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) at Deadline 1. These demonstrate the basis upon which the soil types were identified and confirm the presence of the soil characteristics described within the assessment.	
BMV8	ALC Survey Findings – Soil Lab Analysis	NE welcomes the lab analysis undertaken. Although, it is noted that the depth and texture measurements listed in the soil bore log do not align with the depths and textures provided in the lab analysis, which raises some concern.	Testing for calcium carbonate using 10% hydrochloric acid was undertaken in	Under discussion

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		The percent calcareousness has also not been determined. Therefore, it cannot be confirmed which soils should be considered calcareous. This is a significant omission, as this will impact the Wetness Class, and therefore the ALC Grade. The soils have been tested according to the British Standard for topsoil, which is designed for imported soils. This is not the appropriate soil test in this instance. NE would generally only expect particle size distribution (Texture) and calcareous content to be tested. As per item BMV6, NE requests that the wetness class is recalculated considering the calcareous soils. Based on the available literature and contextual information, NE considers it necessary to take a worst case scenario approach in the absence of complete lab testing to assume all relevant soils have a $CaCO_3$ content of more than 1%. This assumption would need to be noted in	accordance with the ALC guidelines[7]. **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) have been updated at Deadline 1 to clarify where both, negative and positive results, were recorded. Calcareous conditions were not uniformly present across the clay soils. Positive reactions were recorded only in limited and spatially discontinuous locations, with most observations indicating non-calcareous conditions below approximately 25 cm depth. This is consistent with the published soil information, as described within Section 5.6 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent. The field survey results were incorporated into the interpretation of soil wetness and land quality. Sampling for lab analysis was undertaken after the initial field survey and following	

[7] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448 [Accessed 28/07/2026]

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		the SMP, as restoration to the same grade, should the soils not be calcareous, would not be possible. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	harvest and cultivation. Locations were matched as accurately as possible but small-scale spatial variation is likely. The act of cultivation led to minor changes to topsoil depths through loosening. Where lab tests have indicated textural differences from hand texturing of soils in the field the auger logs in **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) have been updated. The change from heavy silty clay loam to silty clay does not, however, lead to changes in wetness classes III and IV. It is noted that BS3882[8] relates to traded topsoil. However, the suite of tests provides both the information required by NE and data relating to plant nutrients that can be considered within Outline Landscape and Ecology Management Plan (**OLEMP)** (Doc Ref. 7.16 Rev 1) for specification of seed mixes.	

[8] BSI (2015) *BS 3882:2015 - Specification for topsoil*

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
BMV9	Assessment Methodology	NE generally welcomes the ES assessment methodology, which follows ISEP (formerly IEMA) guidance ('A New Perspective on Land and Soil in Environmental Impact Assessment').	The Applicant agrees with NE's position and considers that the principles of the assessment methodology are agreed.	Agreed
BMV10	Assessment of impacts to BMV land within the ES: ALC Results	It must be acknowledged that the Applicant's assessment of effects to BMV land is based upon ALC survey results that NE has significant concerns around (see items BMV5 to BMV8). As such, the following advice at items BMV11 to BMV15 may need to be superseded following any amendment to the survey results. See item BMV6. The Assessment at ES Chapter 5 should be updated following amendments to ALC grading. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	Applicant's position to comments raised in BMV5 to BMV8 is provided in rows above. The Applicant does not propose to update the ALC survey mapping based on the comments received.	Under discussion
BMV11	Assessment of impacts to BMV land within the ES: Permanent Loss of	Paragraph 5.8.2 (APP-056) sets out that On-Site Substation and BESS Compounds, Solar Stations and CSEC Compounds will involve the creation of hardstanding, which will be in situ for the lifetime of the development, and	The Applicant has updated **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) for Deadline 1 to consider a permanent effect on Grade 3a from the creation of hardstanding for On-Site Substations and	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
	BMV Land for Hardstanding	removed at decommissioning. Despite the removal at decommissioning, the Applicant has considered, for the purpose of the ES, that the land will be permanently lost where these are sited on Grade 1 and 2 BMV land. Whilst the rationale for this being due to the very high sensitivity of Grade 1 and 2 land is noted, NE considers it may not be possible to re-establish the standard of BMV land for lower grades; particularly Grade 3a, which is still classified as BMV. NE references the recent precedent from the Springwell Solar project which can be found in full in NE Relevant Representation [RR-140]. On-Site Substation and BESS Compounds, Solar Stations and CSEC Compounds requiring hardstanding for the lifetime of the development are sited on BMV land, including Grade 3a, should be considered permanently lost as part of the 'worst case scenario' in the ES. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	BESS Compounds and Solar Stations for a worst-case assessment. (No CSECs are assumed to be placed on Grade 3a land, these are assumed to be placed on Grade 1 or 2 for assessment purposes).	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
BMV12	Assessment of impacts to BMV land within the ES: Downgrading of effect magnitude	Paragraph 5.8.3 (APP-056) discusses the downgrading of the magnitude of effect (from medium to low) of permanent tree and shrub planting as a result of these features being sited along field boundaries. It is noted that impacts of these elements of habitat creation would be major adverse (loss of 8.3ha Grade 1 and 2 BMV) and moderate adverse (loss of 10.8ha Grade 3a BMV) if the standard medium magnitude of effect was applied; so this split from the ISEP guideline is significant. Whilst this impact on the BMV resource differs to that of soil stripping and hardstanding, and siting of these features on field boundaries will reduce the project's lasting effect on the agricultural use of the site, which is a relevant consideration in the decision making process, these enhancements will nonetheless result in a permanent loss of BMV land, which should not be understated within the ES. The downgrading of magnitude of impact of tree and shrub planting along field boundaries should be omitted. Should this amendment not be made, the significance of	Systems integrating trees with agricultural cropping demonstrate that under extreme weather conditions (droughts or winds) trees improve production on the adjacent crop. The data regarding the scale of planting within ALC grades are clearly presented within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). The application of professional judgement and the reason for modifying the assessment contained in Table 5-7 within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) has been further developed for Deadline 1.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		the effect of permanent loss of Grade 1 & 2 BMV land for trees and shrubs should as a minimum be amended to moderate, significant. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.		
BMV13	Assessment of impacts to BMV land within the ES: Overall Permanent Loss of BMV Land	NE considers that all permanent losses of Grade 1 & 2 land (as a very high sensitivity receptor) should be assessed together. The same applies for Grade 3a land (as a high sensitivity receptor). Whilst the permanent losses presented are from different elements of the project (and it's still helpful to present this, which is welcomed) without then considering the total permanent losses from all elements of the development, this is an omission in terms of cumulative assessment of intra-project effects. The ES should present the total permanent losses of Grade 1 & 2 land, and Grade 3a land when determining the overall significant of effects.	The nature of permanent loss of BMV land within the assessment varies with how land will be developed and then also how it will be restored following decommissioning and it is important to present effects in a nuanced way. An additional table and associated commentary reflecting the total permanent loss of BMV land has been included within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) at Deadline 1.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.		
BMV14	Assessment of impacts to BMV land within the ES	Aside from the advice provided above, NE considers the assessment at Chapter 5 to be suitable. The Soil Management Plan (SMP) remains essential mitigation to ensure effects are temporary as described.	NE's recognition of the suitability of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) is noted.	Agreed
BMV15	Soil Management	NE's advice regarding the oSMP is set out in full in our Relevant Representation [RR-140] but is summarised below. The following items must be updated in the oSMP pre-consent: • ALC survey of other unsurveyed areas (including inaccessible areas and areas of high UXO risk) must be carried out post-consent; the oSMP should be updated to reflect this. • The oSMP should be updated to ensure that the commitment to restore agricultural land to the same ALC grade is secured.	The **OSMP** (Doc Ref. 7.14 Rev 1) has been updated for Deadline 1 to reflect the requested information, as described below: • Unsurveyed areas will be subject to field survey. A requirement has been included within Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1). • Paragraph 4.1.3 last bullet of the **OSMP** (Doc Ref. 7.14 Rev 1) states that the detailed SMP will include a target specification for the restored soils which will be established according to location and soil types, end use and the existing baseline ALC grade. In addition, paragraph 5.7.2 of	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		• The oSMP should be updated to ensure that aftercare where soils have been stripped, stored, moved and reinstated is included. The following items should be included in the oSMP pre-consent, but must be included in the final SMP post-consent: ▪ No Soil Budget has been provided in the oSMP. ▪ No reference is made to the need for soil bunds to be in place for more than six months to be grassed and regularly cut to avoid excessive weed growth. Requirement 19 should be updated to include consultation with NE on the final SMP. NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 1.	the **OSMP** (Doc Ref. 7.14 Rev 1) states that 'Decommissioning will aim to restore all agricultural land without any degradation of the current ALC Grade, as informed by the detailed ALC survey.' As such, the commitment is considered to be sufficiently secured within the **OSMP** (Doc Ref. 7.14 Rev 1). • Aftercare measures for soils that have been stripped, stored, moved and reinstated will be ensured by making provision, to the owner or manager of the land, for specialist technical advice from soil scientists, agronomists or agricultural engineers, as necessary. This commitment is established at Deadline 1 for the **OSMP** (Doc Ref. 7.14 Rev 1). • Soil budgets will not be established until the detailed Soil Management Plan. • Paragraph 4.1.9 of the **OSMP** (Doc Ref. 7.14 Rev 1) has been updated to state that soil bunds stored for six	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			months or longer will be seeded and managed to prevent woody vegetation from establishing. The Applicant has amended Requirement 19 of the draft DCO (Doc Ref. 3.1 Rev 2) submitted at Deadline 1 to include NE as a consultee in relation to the approval of the Soil Management Plan.	

3.6. Biodiversity Net Gain

Table 3-6 Areas of Discussion with Natural England – Biodiversity Net Gain

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE26	Biodiversity Net Gain	NE has not reviewed the BNG metric in detail, but welcomes the commitment in the Draft DCO [APP-028] to the delivery of a minimum of 10%, 400% and 10% net gains for Habitat, hedgerow and watercourses, respectively.	The Applicant agrees with NE's position.	Agreed

3.7. Other Matters

Table 3-7 Areas of Discussion with Natural England – Other Matters

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
NE27	Ancient Woodland	Natural England notes that no Ancient Woodland is present within 2 km of the site and that site surveys confirmed no Ancient Woodland would be affected by the Scheme. Therefore, no impacts on this irreplaceable habitat are anticipated. NE notes that individual ancient/veteran trees have been identified on site (APP-242 Table 5-3), however, development design has avoided any direct effects, and indirect effects during construction are to be managed via the Arboricultural Method Statement, secured via the oCEMP.	The Applicant agrees with NE's position.	Agreed

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 Natural England	Name Job Title Date Signature