Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.13 Statement of Common Ground with Natural England

(Rev 1) (Clean)

APFP Regulation 5(2)(q)

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

October 2026

Contents

1. Introduction **1**
1.1. Overview 1
2. Record of Engagement **3**
2.1. Summary of Engagement Undertaken 3
3. Statement of Common Ground **7**
3.1. Internationally Designated Sites 7
3.2. Nationally Designated Sites 23
3.3. Designated Landscapes 24
3.4. Protected Species Licensing 24
3.5. Soils and Best & Most Versatile Land 25
3.6. Biodiversity Net Gain 48
3.7. Other Matters 49
4. Signatures **50**

Tables

Table 2-1: Record of Engagement 3
Table 3-1: Areas of Discussion with Natural England – Internationally Designated Sites 7
Table 3-2 Areas of Discussion with Natural England – Nationally Designated Sites .. 23
Table 3-3 Areas of Discussion with Natural England – Designated Landscapes 24
Table 3-4 Areas of Discussion with Natural England – Protected Species Licensing . 24
Table 3-5 Areas of Discussion with Natural England – Soils and Best & Most Versatile Land 25
Table 3-6 Areas of Discussion with Natural England – Biodiversity Net Gain 48
Table 3-7 Areas of Discussion with Natural England – Other Matters 49

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 Habitats Regulations Assessment (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.

Date	Form of Engagement	Details
09/09/2025	Email	Natural England issued an advice letter, providing their comments on the detailed ALC survey results.
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.
17/09/2026	Online Meeting	Regular catch up call to discuss the preparation of the SoCG.

Date	Form of Engagement	Details
30/09/2026	Online Meeting	Regular catch up call to discuss the preparation of the SoCG.
15/10/2026	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). **Deadline 2 Update:**	The supporting wintering bird reports (**ES Appendices 9-4 to 9-6** [REP1-036, REP1-038 and REP-040] were updated for Deadline 1 to acknowledge that any wetland bird species would be considered to form part of the Waterbird Assemblage for The Wash.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE reviewed the documents submitted by the Applicant at Deadline 1 and welcomes the consideration of Golden Plover as a qualifying species. Any further identification or assessment of Functionally Linked Land (FLL) should also treat Lapwing, Golden Plover and Whooper Swan as main components of The Wash SPA waterbird assemblage.		
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 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. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1 and welcomes	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 2) was updated for Deadline 1 to address relevant points, including additional detail in Table 4 regarding impact pathways on FLL.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		the update to HRA Table 4 regarding impact pathways on FLL. No further issue is raised.		
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. 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. **Deadline 2 Update** NE has reviewed the documents submitted by the Applicant at Deadline 1. NE does not agree that all areas identified in Appendix 3 should be discounted from further consideration as FLL, particularly where substantial numbers of Whooper Swan, Lapwing and Golden Plover were recorded. The areas of potential FLL presented in HRA Appendix 3 should be retained within the	**ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 2) was updated 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 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 2), 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.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		assessment of FLL at the appropriate assessment and impacts via habitat loss and disturbance should be included, or compelling evidence and clearer spatial justification should be provided to support their exclusion. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	**Deadline 3 Update** The Applicant acknowledges NE's comments at Deadline 2 and has reviewed the level of precaution applied to the selection of areas to be treated as FLL to include locations *"where substantial numbers of Whooper Swan, Lapwing and Golden Plover were recorded"*, and updated **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2) for Deadline 3 accordingly. This adopts a precautionary approach, as suggested and considered specifically the effects of impacts on additional areas included in consideration of FLL.	
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. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1 and whilst the	Where SPA species occur within the Order Limits, the determination of functional value in relation to the SPA has been detailed within the **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 2) which was updated 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 Report** (Doc Ref 6.3 Rev 2) submitted at Deadline 1 has amended the use of "*potential* areas of FLL" with	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		summary of bird use of the areas of potential FLL at Appendix 3 is welcomed, the locations of each parcel are not presented or discussed. NE therefore requests that mapping is provided to show all potential FLL in relation to the Order Limits and proposed works. Where FLL could be lost or significantly disturbed, update the HRA, mitigation and in-combination assessment accordingly. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	"*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 {REP1-074]. **Deadline 3 Update:** The Applicant acknowledges NE comments that were made at Deadline 2 and can confirm that additional mapping of areas of potential FLL considered has been provided within the updated **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2) for Deadline 3. **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2) has also been updated to include full consideration of additional areas screened in as to be treated as FLL, as set out response to NE5.	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
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 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. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1 and whilst NE	The Outline Construction Environmental Management Plan (**OCEMP)** (Doc Ref 7.10 Rev 3) and Outline Decommissioning Environmental Management Plan (**ODEMP)** (Doc Ref 7.12 Rev 2) were updated for Deadline 1 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. **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 2) was also updated for Deadline 1 to screen these 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 3) and **ODEMP** (Doc Ref 7.12 Rev 2) would need to be applied.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		welcomes the screening-in of noise and visual disturbance to the appropriate assessment, further justification and securing of seasonal avoidance and noise mitigation are required. The Appropriate Assessment should assess a precautionary worst case, including residual disturbance where uncertainty around mitigation remains. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	**Deadline 3 Update:** The Applicant acknowledges the additional comments provided by NE at Deadline 2 and has responded in full in **Applicant's Comments on Deadline 2 Submissions** (Doc Ref 8.38). A summary of the response is provided below. Construction lighting would only be used during core working hours where natural lighting is unable to reach. This would likely require some lighting at dawn and dusk during winter months, but the application of the principles in **OCEMP** (Doc Ref. 7.10 Rev 3) and the limited requirement for lighting would mean that it is considered unlikely that this would result in a significant effect on areas of FLL. The generic application of a broad winter working avoidance period is a precautionary approach and represents the periods when birds were recorded that could be at risk. Assuming that birds would be absent at a particular time based on prior records would carry significant risk, and a more general approach is therefore more precautionary and considered appropriate. However, in	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			those cases where works are necessary within the winter period, data could be used to inform timing so works to reduce risk. The approach acknowledges that working in this period may be unavoidable in some cases, hence the inclusions for precautionary methods of working in the **OCEMP** (Doc Ref. 7.10 Rev 3). The Applicant is in agreement that the role of the ECoW should, in the first instance, be to identify if relevant birds are present and at what distance. However, it is not proportionate to prevent all works when birds are present at 700m-1100m as the risk of disturbance is low. The ECoW would observe during setup and if the relevant (qualifying) species of birds are showing sensitivity to less noisy works, then it would be appropriate to delay. The **OCEMP** (Doc Ref. 7.10 Rev 3) has been revised at Deadline 3 to clarify the role of the ECoW in this respect. It is considered that the proposed mitigation measures will be sufficiently robust to prevent significant effects as a result of disturbance on FLL as works will not be	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			undertaken where noise levels cannot be adequately managed and relevant birds are present that could be disturbed. On this basis, it is not considered appropriate to assess impacts on the precautionary assumption that mitigation will not be effective. On this basis, cumulative effects also can be reasonably screened out.	
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. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1. The predator-shadow assessment should be revisited if additional FLL is identified closer to the proposed pylons. Mapping is required to demonstrate the relationship between all	Noted, and refers to the Applicant's position on NE5. **Deadline 3 Update:** The Applicant acknowledges NE comments at Deadline 2 and has revised **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2) at Deadline 3 to incorporate consideration of additional precautionary FLL, as described in the response to NE5, within the assessment of predator shadow effects.	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		potential FLL, the Order Limits and the predicted zone of influence. **Deadline 3 Update** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.		
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	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Wash SPA/Ramsar and Nene Washes Ramsar sites.		
NE12	Stage 1 – Air Pollution	Natural England has produced 'Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects' and have no bespoke comment to provide with regard to air quality impacts.	Noted, no further response required.	Agreed
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). **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1 NE welcomes the inclusion of noise and visual disturbance in the Appropriate Assessment. However,	Applicant's position to NE5-8 is provided in rows above.	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		the extent and location of all potential FLL must first be established, with any additional operational habitat loss also being taken to Appropriate Assessment where relevant.		
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 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	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 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 **OOEMP** (Doc Ref. 7.11 Rev 2) 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	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		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. NE recommends the detailed design of line marker deployment is secured within the DCO, including requirement for consultation with NE **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1. NE welcomes the inclusion of consultation with NE on the detailed design of bird diverters within the oOEMP. It is queried whether the DCO Requirement for the oOEMP requires updating to secure this. NE does not dispute the conclusion of the Appropriate Assessment with regard to collision risk and concurs that reliance on monitoring as mitigation is not appropriate. Nonetheless, NE recommend the	secured through the **OOEMP** (Doc Ref. 7.11 Rev 2). **Deadline 3 Update:** The Applicant acknowledges the additional comments provided by NE at Deadline 2 and has responded in full in **Applicant's Comments on Deadline 2 Submissions** (Doc Ref 8.38). A summary of the response is provided below. The Applicant considers the existing provisions in the **OOEMP** (Doc Ref. 7.11 Rev 2) sufficient and does not propose any amendment to Requirement 13. The **OOEMP** (Doc Ref. 7.11 Rev 2) already requires consultation with Natural England at the detailed design stage to determine the specification of bird diverters and identifies that diverters will be installed on overhead line spans identified through the collision risk assessment as posing an elevated risk to birds. Requirement 13 further ensures that the detailed OEMP is substantially in accordance with the approved OOEMP and implemented throughout operation of the Scheme.	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		establishment of a clear and accessible reporting mechanism to facilitate the recording of collision incidents. This should enable landowners, environmental NGOs, local bird groups and members of the public to report suspected collisions, thereby contributing to a comprehensive evidence base to inform adaptive management measures and the timely removal of carcasses where required. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	However, the **OOEMP** (Doc Ref. 7.11 Rev 2) has been updated for Deadline 3 to include reference to a reporting mechanism to facilitate the recording of collision incidents and inform adaptive management to address the balance of Natural England's comments.	
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).	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	Not Agreed – but not considered material to the outcomes of the assessment.

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		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 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. **<u>Deadline 2 Update</u>** NE reviewed the documents submitted by the Applicant at Deadline 1 and whilst NE notes the Applicant's rationale, NE has no further comments and confirms that our previous advice remains unchanged.	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 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	The Applicant agrees with NE's position. The Applicant agrees that the collision risk	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		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.	modelling data can be shared with NGET upon request.	
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. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1 and confirms that NE's position remains unchanged. Further assessment of disturbance and loss of FLL is required within the Appropriate Assessment before adverse effects on site integrity can be ruled out	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
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 local planning authorities and other local bodies.	The Applicant agrees with NE's position.	Agreed

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	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		required under other legislation must still be obtained.		

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 2).	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
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
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 2). 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,	Not Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			design-led practice for NSIPs that include linear infrastructure elements. As a worst-case assumption within **ES Chapter 5: Agriculture and Soils** [REP1-014], 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	Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 2) was 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** [REP1-014] was updated at Deadline 1 to acknowledge that 100% survey coverage of the Solar Development Areas was not possible and	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		provided for any remaining un-surveyed areas across the site. The oSMP, secured by DCO Requirement 19, must make clear commitment for the completion of the ALC dataset. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1 and welcomes the commitment in OSMP Section 3.1 to complete ALC surveys in previously inaccessible areas, including those affected by UXO constraints.	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 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 Rev 1). Assessment assumptions and limitations in Section 5.5 of **ES Chapter 5: Agriculture and Soils** [REP1-014] was 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	The Applicant notes that the assessment presented within **ES Chapter 5: Agriculture and Soils** [REP1-014] 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	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		grades, we do not agree that a field average approach should be taken when mapping ALC grade. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1. NE remains concerned that field-average and auger by auger mapping may not accurately represent the spatial distribution of BMV land; ALC boundaries should be based on professional interpretation of survey evidence, landform, drainage and soil-landscape relationships. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant.	information presented during pre-application stages. Applicant's full response is provided in the **Relevant Representations Report** [REP1-074] submitted at Deadline 1. **Deadline 3 Update:** The Applicant acknowledges NE's comments at Deadline 2 that ALC mapping should be informed by professional interpretation of the survey evidence and should not rely solely on field-average results or the automatic adoption of agricultural field boundaries as grade boundaries. The purpose of the assessment was to establish the distribution of agricultural land quality across the Site using the results of the field survey, interpreted in the context of the observed site characteristics and features. The Applicant acknowledges that alternative interpretations of individual auger observations may result in minor changes to the mapped boundaries and the calculated distribution of ALC grades. However, such changes would not be expected to result in a material change to the overall impact	

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			assessment given that the point data represents a worst-case scenario for the total area of ALC grades across the Site. The Applicant is considering alternative mapping and will provide an update to their position at Deadline 4.	
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.	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 was included within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] 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
		NE advises that, following updates to soil wetness calculations and ALC gradings (see item BMV6) an updated ALC map should be 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. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1 and considers that the post-1988 survey remains relevant and underlying records should be reviewed if uncertainty over grading persists. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant.	Applicant's full response is provided in the **Relevant Representations Report** [REP1-074] submitted at Deadline 1. **Deadline 3 Update:** The Applicant acknowledges the comments from NE at Deadline 2 and has requested access to the sample point soils data and soil pit descriptions for the 1991 survey from Natural England's Access to Evidence database and is waiting for the data at the time of writing. Once received the Applicant will review the data for depths of soil layers, Wetness Classes, and the presence of carbonates. An addendum of the comparative data relative to the recent field survey will be developed, if required, upon receipt of the data. The Applicant would also note that this data is 35 years old and whilst it can provide historical background information, the data should not automatically be assumed to represent current conditions without supporting evidence. Changes in the effectiveness of land drainage are particularly relevant. Without maintenance and mole drain reinstatement, the soils	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			would perform differently from the 1991 survey. Both the recent soil survey, presented within **ES Appendices 5-2** and **5-3** [REP1-028 and REP1-030], and cropping patterns, presented within Appendix A of the **Applicant's Comments on Local Impact Reports** [REP2-015], identify a wetness constraint over parts of the Solar Development Area.	
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. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1 and considers the HCl testing and carbonate issue	Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidelines[5]. **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] were 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	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
		substantially clarified. However, further clarification is still required on the interpretation of gleying and the resulting wetness classes and ALC grades. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	depth. This is consistent with the 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. **Deadline 3 Update:** The Applicant acknowledges the additional comments provided by NE at Deadline 2 and has responded in full in **Applicant's Comments on Deadline 2 Submissions** (Doc Ref 8.38). In summary, soil colour was assessed in situ using a Munsell Soil Colour Chart under field viewing conditions. A substantial proportion of the matrix colours recorded during the field assessment were borderline in appearance. Although some of these colours may appear relatively pale, muted or greyish, visual appearance alone is insufficient to classify a horizon as gleyed. Classification was therefore based on the recorded	

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			Munsell colour in relation to the colour criteria specified in the relevant MAFF guidance, rather than on subjective visual interpretation or photographic appearance. Where the observed matrix colour did not satisfy the applicable criteria for a gleyed horizon, the soil was recorded as ungleyed. The mapped distribution of gleyed soils was considered as contextual information but was not treated as determinative of the classification at individual observation points. Mapping provides a broader indication of the likely distribution of soil characteristics, whereas the field assessment records the conditions observed at the specific location and within the individual horizon examined. Accordingly, horizon classifications were assigned on the basis of the site-specific field evidence and the applicable MAFF criteria, rather than inferred solely from the wider mapped soil distribution.	
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	Auger borehole logs were recorded in accordance with the Field Survey	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		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 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	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. The ALC survey reports (**ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030]) 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 were provided within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] at Deadline 1. These demonstrate the basis upon which the soil types were identified and confirm the	

[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
		for PINS' consideration as a further concern regarding the robustness of the ALC survey. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1. NE welcomes the additional soil evidence but remains concerned about inconsistencies between the reported variability, auger logs, pit evidence and interpretation of gleying. No further survey is requested at this stage, but these matters should be considered when assessing the robustness of the ALC assessment. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	presence of the soil characteristics described within the assessment. **Deadline 3 Update:** The Applicant acknowledges the additional comments provided by NE at Deadline 2 and has responded in full in **Applicant's Comments on Deadline 2 Submissions** (Doc Ref 8.38). In summary, 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. The similarity between certain auger logs reflects the homogeneity of soil forming materials across the Site, particularly within the identified clay-dominated soil units, which laboratory analysis confirms to be texturally consistent. Where variation does occur within soil types, this is captured within the dataset, particularly in relation to topsoil depth (ranging from approximately 20 cm to 50	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			cm) and variability in subsoil horizon development (including both single and multiple horizon expressions extending to between 60 cm and 90 cm depth). These differences are significant in the context of Agricultural Land Classification, particularly in relation to the depth to slowly permeable layers and resultant wetness class assessment. In addition, variation in diagnostic features such as mottling (including presence or absence of ochreous and grey mottles) further demonstrates that auger observations were independently assessed at each location rather than transcribed from previous logs. Notwithstanding the above and noting that NE does not seek additional survey work, the Applicant has updated the **OSMP** (Doc Ref. 7.14 Rev 2) for Deadline 3 to identify that additional soil pits will be dug alongside an investigation of field drainage to inform the production of the detailed Soil Management Plan post-DCO consent. The information will verify ALC grading so that. restoration of soils at decommissioning	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			would be undertaken against the verified baseline.	
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. 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.	Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidelines[7]. **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] were 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** [REP1-014], which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent. The field survey results were	Agreed

[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]

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		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 the SMP, as restoration to the same grade, should the soils not be calcareous, would not be possible. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1. NE notes that the laboratory testing undertaken has provided the information necessary to inform the ALC assessment. although it differs from the standard testing approach typically used for ALC surveys, no further issue is raised.	incorporated into the interpretation of soil wetness and land quality. Sampling for lab analysis was undertaken after the initial field survey and following 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** [REP1-028 and REP1-030] 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	

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

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE considers the matter relating to HCl testing to be clarified and remove our request for a worst-case scenario assessment assuming all soils are calcareous. However, the further information requested within BMV6 regarding soil wetness class is still required.	Ref. 7.16 Rev 2) for specification of seed mixes.	
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. **Deadline 2 Update**	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

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE reviewed the documents submitted by the Applicant at Deadline 1. NE continues to have concerns regarding the robustness of the ALC survey results, as detailed under BMV5 to BMV8. This may have a bearing on the ES conclusions regarding impacts to BMV land; as such, these uncertainties should be taken into account in the decision-making process.		
BMV11	Assessment of impacts to BMV land within the ES: Permanent Loss of BMV Land for Hardstanding	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 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	The Applicant updated **ES Chapter 5: Agriculture and Soils** [REP1-014] for Deadline 1 to consider a permanent effect on Grade 3a from the creation of hardstanding for On-Site Substations and 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).	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		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. **Deadline 2 Update** NE reviewed the documents submitted by the Applicant at Deadline 1 and welcomes the assessment of all BMV land beneath permanent hardstanding as permanently lost. The revised major adverse significant effect reflects our previous advice.		
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	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** [REP1-014]. The application of professional	Under discussion

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		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 the effect of permanent loss of Grade 1 & 2 BMV land for trees and shrubs should as a minimum be amended to moderate, significant. **Deadline 2 Update:** NE reviewed the documents submitted by the Applicant at Deadline 1. NE does not	judgement and the reason for modifying the assessment contained in Table 5-7 within **ES Chapter 5: Agriculture and Soils** [REP1-014] was further developed for Deadline 1. **Deadline 3 Update:** The Applicant acknowledges the additional comments provided by NE at Deadline 2 and has responded in full in **Applicant's Comments on Deadline 2 Submissions** (Doc Ref 8.38). In summary, the Applicant notes a variance in professional opinion which has been discussed with NE, with positions continuing to differ. The Applicant notes that planting of hedgerows may be undertaken by landowners independently of the planning process and is encouraged by Natural England and Defra, with ambitious targets for hedgerow creation and restoration. The Applicant is not proposing blocks of tree planting (which may give rise to significant effects on BMV land) but would note that linear planting at field margins represents good practice, including in relation to land and agricultural production.	

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		agree with reducing the effect magnitude for approximately 19.1 ha of BMV land permanently lost to tree and shrub planting. The loss should be assessed as medium magnitude in accordance with the Applicant's methodology. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	The application of a buffer to the boundary planting to calculate land take acknowledges a potential canopy and hedgerow spread and potentially exaggerates land take required. Throughout the operational phase, the stem size of the trees and hedges (the direct occupation of the land) would remain less than 1m wide. An allowance has been made for canopy development and for dedicated access for hedgerow management, which represents the worst-case effect on BMV land. The approach has been openly expressed but an alternative measuring of only the footprint of the planting could have been applied, greatly reducing threshold categories. It is further reason why the application of professional judgement was appropriate. The Applicant is satisfied that these nuances of presentation require that land use is subject to professional judgement rather than rigid application of ISEP thresholds. Moreover, the Applicant considers that its approach to allocating a buffer for active operational management of vegetation was progressively open and responsible,	

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			The data regarding the scale of planting within ALC grades are clearly presented and the rationale for the judgement is included. Further discussion of how professional judgement was exercised for assessment is contained in Table 5-7 within **ES Chapter 5: Agriculture and Soils** [REP1-014].	
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. **Deadline 2 Update:**	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 was included within **ES Chapter 5: Agriculture and Soils** [REP1-014]at Deadline 1. **Deadline 3 Update:** The Applicant acknowledges the comments made by NE at Deadline 2 and notes in response to BMV12 discussion of how professional judgement was exercised for the assessment is contained in Table 5-7	Under discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		NE reviewed the documents submitted by the Applicant at Deadline 1 and continues to advise that the ES conclusions should be based on the overall total permanent loss of BMV land. Whilst they may be relevant to the overall decision making process, wider environmental benefits or boundary planting do not reduce the area permanently removed from agricultural production. **Deadline 3 Update:** NE will review and provide an update on their position following a review of documents submitted by the Applicant at Deadline 3.	within **ES Chapter 5: Agriculture and Soils** [REP1-014]. The Applicant has previously noted (and referenced) that agricultural systems that integrate trees with cropping perform better under extreme weather conditions (droughts or winds) That is, the presence of trees and hedgerows improve production on the adjacent crop. The Applicant remains satisfied that the data are presented openly and judgement has been applied appropriately in accordance with the ISEP guidelines, such that the conclusions of the ES are appropriate and robust.	
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** [REP1-014] 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:	The **OSMP** (Doc Ref. 7.14 Rev 2) was updated for Deadline 1 to reflect the requested information, as described below: • Unsurveyed areas will be subject to field survey. A requirement was	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		• 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 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.	included within Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 2). • Paragraph 4.1.3 last bullet of the **OSMP** (Doc Ref. 7.14 Rev 2) 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 the **OSMP** (Doc Ref. 7.14 Rev 2) 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 2). • 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,	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Requirement 19 should be updated to include consultation with NE on the final SMP. **<u>Deadline 2 Update</u>** NE reviewed the documents submitted by the Applicant at Deadline 1. NE welcomes the clarifications and amendments made to the oSMP in response to our comments and raises no further concerns.	as necessary. This commitment was established at Deadline 1 for the **OSMP** (Doc Ref. 7.14 Rev 2). • Soil budgets will not be established until the detailed Soil Management Plan. • Paragraph 4.1.9 of the **OSMP** (Doc Ref. 7.14 Rev 2) was updated to state that soil bunds stored for six months or longer will be seeded and managed to prevent woody vegetation from establishing. The Applicant amended Requirement 19 of the **draft DCO** (Doc Ref. 3.1 Rev 3) 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	The Applicant agrees with NE's position.	Agreed

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Draft DCO [APP-028] to the delivery of a minimum of 10%, 400% and 10% net gains for Habitat, hedgerow and watercourses, respectively.		

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