Meridian Solar Farm

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Post Submission Application Documents

8.32 Applicant's Comments on Deadline 2 Submissions

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1. Introduction

1.1.1. This report provides Meridian Solar Farm Limited's (the 'Applicant') response to the matters raised in Deadline 2 submissions submitted by Interested Parties concerning Meridian Solar Farm (the Scheme).

1.1.2. A total of 14 Deadline 2 submissions submitted by Interested Parties were

1.1.3. received.

1.1.4. All Deadline 2 submissions have been responded to by setting out the Applicant's position on the matter at the time of writing. In some cases, the Applicant has previously responded to these points within documents previously submitted into Examination. Where this is the case, and no new or different points are raised, the Applicant has cross-referred to the relevant sections of the documents previously submitted rather than reproducing the response in full.

1.1.5. Likewise, where matters are already covered within a Statement of Common Ground (SoCG) with an Interested Party, the Applicant has not reproduced those responses, and has cross-referenced to the relevant SoCG.

1.1.6. This document has been structured alphabetically by Interested Party.

2. Applicant's Comments on Deadline 2 Submissions

2.1. Overview

2.1.1. The following sections provide a response to each of the Deadline 2 submissions received.

2.2. Environment Agency

2.2.1. The following table provides a response to the Environment Agency's (EA) Deadline 2 comments [REP2-023] which were marked as 'unresolved'.

Table 2-2 Responses to new queries raised in the Environment Agency Deadline 2 Submission

Reference	Topic	Summary of Matters Raised	Applicant's Response
EA4	Draft Development Consent Order	Remove the word substantially from all requirements. EA maintains its position.	The Applicant's response to this matter is set out within the **Statement of Common Ground with Environment Agency (**Doc Ref. 8.12 Rev 2), ref 2.1.
EA6	Draft Development Consent Order	We maintain our position that we require 15 working days for named consultees to review the consultation & determine if sufficient information has been provided.	The Applicant's response to this matter is set out within the **Statement of Common Ground with Environment Agency (**Doc Ref. 8.12 Rev 2)., ref 2.3.
EA11	Flood Risk	We acknowledge the Applicant's explanation of the flood scenarios selected as the 'credible maximum' events. However, further justification is required to demonstrate why the chosen return interval and climate change scenarios for each catchment represent a	The Environment Agency (EA) advised in an email on 17 June 2025 that the Welland model should be run with 0.1% AEP plus Higher Central climate change allowance for the residual breach event. The Applicant does not consider that a different allowance for different models in the same Scheme

Reference	Topic	Summary of Matters Raised	Applicant's Response
		suitably conservative approach to assessing the 'credible maximum', particularly where they differ from the methodology set out in the Government guidance, Flood Risk Assessment: Climate Change Allowances.	is justified and considers that the advised approach should be applied consistently across all three models. The credible maximum scenario should be a single, coherent test of the Scheme, not tests set at different severities. The credible maximum scenario is normally tested using the Flood Zone 3 (1% AEP) extent with the Upper End allowance, to examine how the Scheme performs under extreme conditions. In this case, the Scheme has been assessed against the 0.1% AEP event, which is a considerably rarer and more onerous baseline. The credible maximum scenario therefore already begins from a more severe starting point than the 1% AEP event, and the 0.1% AEP flows are substantially larger than their 1% AEP counterparts. Layering the Upper End allowance on top of the 0.1% AEP event would compound two conservative assumptions and give an extreme, very low-probability combination that goes beyond what is needed to demonstrate the scheme's resilience. Noting that a more onerous H++ sea level rise scenario does not impact the Scheme with the proposed embedded mitigation in place, it is considered that the Higher Central allowance is appropriate in this case.

Reference	Topic	Summary of Matters Raised	Applicant's Response
EA12	Flood Risk	Following the EA/Applicant meeting on 16 September 2026, the Applicant agreed to undertake additional assessment of flow conveyance routes within Flood Zone 3b. This work should demonstrate that the proposed solar panel support structures within Flood Zone 3b will not adversely affect flood flow routes.	Following the EA / Applicant meeting, localised 2D modelling was undertaken covering the Gotts Catchment to assess the impact from the Scheme with conveyance routing within the functional floodplain. The Applicant shared the model results with the EA on 19 October 2026 and will record updates on engagement on this matter via the **Statement of Common Ground with Environment Agency (**Doc Ref. 8.12 Rev 2). In summary, the model was run to inform flood conveyance routes within the Gotts catchment for the joint 0.1% AEP plus 28% climate change event. The results show the localised 2D model predicts a peak flood level of 1.78m AOD, representing a 69mm reduction in maximum flood level compared to the current 1D-only model level of 1.85m AOD. This reduction is due to 2D flood attenuation and lateral surface spreading across the functional floodplain, which better represent floodplain storage and conveyance than the 1D reservoir's level-pool storage assumptions. The 2D model also confirms flow conveyance across the floodplain is not impacted by the Scheme, with slow propagation of flooding across the catchment. The proposed infrastructure within Flood Zone 3b has been designed to remain operational in times

Reference	Topic	Summary of Matters Raised	Applicant's Response
			of flood, with 600mm freeboard provided for solar stations, and it does not materially increase flood risk or adversely affect the operation or function of the functional floodplain. As such, the 2D model review presents no material change to the conclusions presented in **ES Appendix 11-3: Flood Risk Assessment (FRA)** [REP1-050] and the Applicant considers that they remain valid.
EA13	Flood Risk	The Applicant has not yet provided sufficient evidence to demonstrate that opportunities to reduce flood risk have been explored, as required by the Exception Test. The FRA should be updated to include: • Evidence that flood risk reduction opportunities were considered; • Assessment of potential measures and their feasibility; and • Justification where opportunities were discounted. Applicant response focuses on mitigating flood risk impacts on the development itself but does not demonstrate that wider opportunities for flood risk betterment were explored within the affected catchments.	As referenced within the **Relevant Representations Report** [REP1-074] in response to EA13, regarding flood risk reduction opportunities across the Scheme, fluvial flood depths are shallow and widely distributed, with mitigation measures for the Scheme provided in the form of bunds or walls and raised infrastructure, displacing floodwater extents within a large flood extent, which leaves little residual capacity within the same hydraulic catchment to provide additional storage, noting the embedded mitigation does not materially increase flood risk elsewhere. Creating meaningful additional floodplain storage within the Site would require a substantial area of land to be excavated and taken out of the Solar Development Area layout. Using the calculated solar station displacement volume within the Gotts catchment as an example, for the 1% AEP plus 13% climate

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Additional evidence and supporting narrative within the FRA are required to satisfy this element of the Exception Test.	change scenario, approximately 252m³ of floodplain storage equates to an average flood depth change of around 0.7mm across the 34.6ha flood extent of Flood Zone 3a and 3b in the Gotts Catchment. Extrapolating this relationship indicates that achieving an average flood depth reduction of 100mm (0.1m) would require approximately 36,000m³ of additional floodplain storage. Assuming an excavation depth of 2m, this would equate to an excavated area of approximately 18,000m² (1.8 ha), requiring a substantial area of land to be excavated within the Solar Development Area. It is likely excavating a depth of 2m would not allow floodwaters to re-enter the watercourses due to the shallower depths of the watercourses across the Scheme, causing significant risk of ponding for long durations, reducing existing floodplain capacity. Shallower excavations would require even larger areas to be lost for the Scheme's energy generation capacity. This would reduce the installed generating capacity and the operational output of the solar farm, undermining the primary purpose of the development and the associated renewable energy benefits. Excavation of soils for flood storage and the removal of material would also be associated with potentially significant

Reference	Topic	Summary of Matters Raised	Applicant's Response
			effects on below ground archaeology, the loss of soil resource and would require additional HGV movements and land to partially dry soil for removal. Suitable land elsewhere within the catchment is also flat and limited in opportunity to utilise as storage, and is also not available to the Applicant. The embedded mitigation for the Scheme, therefore, ensures there is no material increase in flood risk elsewhere, but cannot deliver a net reduction without compromising the viability and operational capacity of the Scheme. Although the Scheme does not propose net reductions to fluvial flood risk, the Scheme is delivering betterment through the surface water drainage strategy, with the use of appropriate SuDS measures. SuDS will manage runoff from all new impermeable areas, restricting peak discharge to Qbar rates up to the 0.1% AEP flood event plus climate change allowance. This reduces peak flows to receiving watercourses in higher return period events and reduces surface water flood risk elsewhere. **ES Appendix 11-3: Flood Risk Assessment (FRA)** [REP1-050] will be updated at Deadline 4 to

Reference	Topic	Summary of Matters Raised	Applicant's Response
			include the additional discussion regarding opportunities for flood risk reduction across the Scheme within the Exception Test section.
EA24	Aquatic Ecology & Fish	We note and welcome the Applicant's response to this issue. However, the document ES Appendix 9-1: Ecology Legislation, Policy and Guidance (APP-204) has still not been updated with the following legislation: • The Salmon and Freshwater Fisheries Act (1975) • The Eels (England and Wales) Regulations (2009) We await review of the revised document to resolve this issue • The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 Having met with the Applicant on 24/09/2026 to discuss this matter, we are confident that APP-204 will be updated. We are also satisfied that the pieces of legislation have been considered throughout the relevant assessments and chapters of the ES.	**ES Appendix 9-1: Ecology and Biodiversity Legislation, Policy and Guidance** [REP1-034 and REP1-035] was updated at Deadline 1 to include reference to these pieces of legislation.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		We await review of the revised document to resolve this issue.	
EA25	Aquatic Ecology & Fish	We note and welcome the Applicant's update to the limitations section 9.5 of Chapter 9: Ecology and Biodiversity (APP-060). We have had discussions directly with the Applicant in a meeting on 24/09/2026 and are now satisfied with the assessment that was completed in understanding how waterbodies/watercourses within the draft Order Limits were either scoped in or out. Field visits were undertaken which showed that the majority of waterbodies/watercourses were seasonally dry and not suitable for fish, therefore we support the conclusion to scope out fish surveys at these waterbodies. Where waterbodies/watercourse were seen to be permanently wet, then appropriate design options and mitigation have been taken forward, which was discussed with the Applicant in the meeting on 24/09/2026. Furthermore, details of mitigation have been updated in the oCEMP (APP-275). Impacts to the South Holland Main Drain, which has records of European eel have been	The Applicant has updated the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 3) Tables 3-5 and Table 3-7 for Deadline 3 to include the requested mitigation commitments.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		avoided by using trenchless crossing techniques which is detailed in ES Appendix 2-1: Watercourse Crossing Schedule (APP 169). We request that in addition to the mitigation detailed in the oCEMP that where any over pumping of waterbodies/watercourses takes place, that pumps are fitted with 2mm aperture screens to protect European eel and fish. In addition, where pre-construction fish surveys take place, should notable fish assemblages be found including European eel, then this should inform the design considerations, which may include changing a culvert option to a clear-span crossing option. Furthermore, any culverts in permanently wet waterbodies/watercourses should be designed so as to preserve the natural bedform of the waterbody/ watercourse, ensure fish passage is not impeded and where necessary provide fish easements within the culvert to enable fish passage. This should be captured in the oCEMP. We await review of the revised document to resolve this issue.	

Reference	Topic	Summary of Matters Raised	Applicant's Response
EA26	Aquatic Ecology & Fish	Comment as per EA25. We await review of the revised document to resolve this issue.	This is noted by the Applicant.
EA27	Aquatic Ecology & Fish	We note the Applicant's response and also the discussions in the meeting with the Applicant on 24/09/2026. We welcome the use of clear span crossings on permanently wet waterbodies/watercourses. Where bell mouth crossings are proposed, the EA request that any culverts in permanently wet waterbodies/watercourses should be designed so as to preserve the natural bedform of the waterbody/watercourse, ensure fish passage is not impeded and where necessary provide fish easements within the culvert to enable fish passage. This should be captured in the oCEMP. We await review of the revised document to resolve this issue.	The Applicant has updated the **OCEMP** (Doc Ref. 7.10 Rev 3) Table 3-7 for Deadline 3 to include the requested mitigation commitment.
EA28	Aquatic Ecology & Fish	We note the Applicant's response and welcome the updated wording in ES Appendix 11-2 WFD Report (APP-221). In addition to this we agree with the conclusion of the WFD assessment, provided the updates we have suggested for EA25/EA26 and EA27 are included in the oCEMP.	Please see responses provided to EA25, EA26 and EA27 above.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		We await review of the revised document to resolve this issue.	
EA29	Aquatic Ecology & Fish	Following the discussion with the Applicant on the 24/09/2026 and their response to our Relevant Representation, we are in agreement that screening of pipe outfalls would not be feasible or necessary given the relatively low risk posed to European eel in the waterbodies/watercourses within the draft Order Limits. However, we welcome the inclusion of open green ditches to local receiving watercourses in the design. In the meeting on 24/09/2026 the EA requested whether pipe outfalls could be positioned above water line of receiving watercourses, the Applicant is going to look into this, and we await their response.	The Applicant confirms that measures to minimise the potential for European eel to enter any outfall pipes from receiving watercourses can be considered as part of detailed design. This may include measures such as the specification of outfalls above a certain water level or the use of non-return valves to prevent passage into the outfall pipe. The Applicant has updated the **OCEMP** (Doc Ref. 7.10 Rev 3) Table 3-5 for Deadline 3 to refer to measures to minimise the potential for European eel to enter any outfall pipes being considered as part of detailed design..
n/a	Water Supply	Discussion is ongoing as a basic water supply strategy is undertaken. A meeting on 28/09/2026 confirmed some quantities and made us aware of some water uses not already apparent (landscaping), however supply options also need to be better defined to provide confidence that the typical and peak water demands can be met. Advice provided recommended a multiple source approach of	A **Water Supply Strategy** [REP2-015] has been prepared and was submitted at Deadline 2. A meeting was held with the Environment Agency and Anglian Water Services in advance of Deadline 2. The assessment estimates the Scheme's water demand during construction and operation and reviews potential water supply options. Construction phase water demand is typically

Reference	Topic	Summary of Matters Raised	Applicant's Response
		different sources of supply to provide contingency should any become unviable as the project develops and an application to Anglian Water Services should help to clarify the extent of quantities potentially available from them. The possibility of a de minimus groundwater abstraction (less than 20m3/day) was also raised. Advice from the EA in the meeting was that further assessment would be expected to evaluate quantitative impacts on other abstractions, lawful users and water features. However, on review of our position on unregulated abstractions, these assessments are not normally required and it would not therefore be consistent to request them as part of the planning process either. This option may be more viable to the applicant as a result therefore as part of the supply options available.	estimated at 51.3 m^3/day (excluding irrigation of new landscaping), with an estimated peak construction demand of approximately 269 m^3/day considering worst-case peak workforce numbers, although this would occur only for a short period. Dust suppression estimates have been based on assumptions from a recently consented local solar scheme but could vary depending on weather conditions. Applying a very precautionary sensitivity test (i.e. where dust suppression is required on 75% of days between May and September) non-potable water demand could increase from 34 m^3/day to 69.4 m^3/day. Landscape irrigation would typically come after the main construction phase and would require around 6.4 m^3/day, with watering expected fortnightly between May and September for the first three years after planting, after which it is expected to not be required. During operation, water demand is much lower at approximately 11 m^3/day, which includes a daily estimate for solar panel cleaning, although this is likely to be a more occasional activity. Operational welfare facilities would only require 0.55 m^3/day of water.

Reference	Topic	Summary of Matters Raised	Applicant's Response
			The current proposal is for construction water to be supplied by commercial tanker deliveries from licensed sources. The assessment concludes this is a practical and achievable approach. However, reflecting the recent consultation, a Water Resource Assessment request has been submitted to Anglian Water Services. It may also be possible for some compound locations to connect directly to the mains supply, and this is also to be considered in consultation with Anglian Water Services. Alternative options include obtaining water through abstraction licence trading, and as the Environment Agency have suggested, a de minimis abstraction on site. However, at this stage direct abstraction from local watercourses or a new groundwater borehole is not favoured due to uncertainty over water availability, implementation costs and practicality. The Scheme has also committed to investigate options to minimise water demand and reuse and recycle water where possible (e.g. rainwater harvesting) and the **OCEMP** (Doc Ref. 7.10 Rev 3), **Outline Operational Environment Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 2) were updated at Deadline 2 to reflect this. However, these measures are not considered capable of meeting

Reference	Topic	Summary of Matters Raised	Applicant's Response
			the Scheme's water requirements on their own and would supplement, rather than replace, the main water supply source.

2.3. Lincolnshire County Council

2.3.1. The following table provides a response to any new or evolved matters raised in LCC's Deadline 2 comments [REP2-022].

Table 2-13 Responses to new queries raised in the LCC Deadline 2 Submission

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.1	Schedule 2 Requirements	Requirement 5 (Detailed design Approval). With respect to Requirement 5, in line with other made DCO's, we would request that LCC, as relevant Highways Authority, be a Required Consultee, given the nature of the details that need to be approved.	The Applicant's response to this matter is set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-16, row 16.11.
3.2	Schedule 2 Requirements	Requirements 7 (LEMP) & 8 (BNG) Lincolnshire County Council (LCC) is the Responsible Authority for the Greater Lincolnshire Local Nature Recovery Strategy and maintains a strategic overview of the delivery of BNG across the County. LCC therefore requests to be added as a consultee for the discharge of Requirement 7 (Landscape and Ecology Management Plan) and Requirement 8 (Biodiversity Net Gain).	The **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3 to add Lincolnshire County Council as a consultee for the discharge of both Requirement 7 (Landscape and Ecology Management Plan) and Requirement 8 (Biodiversity Net Gain).
3.3	Schedule 2 Requirements	Also at Requirement 7 (LEMP) there is inconsistency in the reference to "commence", said here to include demolition of existing buildings and structures, but under Article 2 (Interpretation), this part of the definition has	The Applicant notes LCC's comment. The inconsistency identified arose from the removal of references to demolition within the definition of "commence" in Article 2, reflecting that there are no demolition works proposed as part of the

Reference	Topic	Summary of Matters Raised	Applicant's Response
		been removed. Under the Schedule of Changes to the Draft DCO [REP1-101], the reason for the removal of 'demolition of existing buildings and structures' is because there are no demolition works proposed as part of the Scheme.	Scheme. To address this point, the Applicant has updated Requirement 7 at Deadline 3 to remove the corresponding reference to demolition works, thereby ensuring consistency between Requirement 7 and the definition of "commence" in Article 2. A corresponding consequential amendment has also been made to Schedule 1 (associated development, paragraph (o).
3.4	Schedule 2 Requirements	Requirement 12 (CEMP) – with respect to Requirement 12 (Construction Environmental Management Plan), LCC seek clarification on the reference to 'site waste management plan' at 12(4) and confirmation as to whether this is a cross-reference to Requirement 14 (Waste Management Plan).	The Applicant confirms that the reference to a "site waste management plan" in Requirement 12(4) is not intended to be a cross-reference to Requirement 14. Requirement 12 currently secures waste management measures as part of the Construction Environmental Management Plan, whilst Requirement 14 separately secures a Site Waste Management Plan for the operation phase. The Applicant acknowledges that the current drafting may give rise to confusion and duplication. Accordingly, the **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3 to remove the reference to a Site Waste Management Plan from Requirement 12 and to amend Requirement 14 so that it secures waste management measures across the construction,

Reference	Topic	Summary of Matters Raised	Applicant's Response
			operation and decommissioning phases of the Scheme. The Applicant considers that this approach provides a clearer and more proportionate framework for securing waste management measures and addresses the potential overlap identified by LCC.
3.5	Schedule 2 Requirements	In LCC's Local Impact Report (LIR) [REP1-106], under the draft DCO section, there is reference (paras 8.17 & 8.17) to the need for an additional requirement to restrict commencement of development until such time as a grid connection into Weston Marsh has been secured. In the Relevant Representations Report [REP1-074] at LCC-013, the applicant reiterates that there is no evident barrier to being granted a Gate 2 status, but with unresolved objections from NGET, LCC remains concerned that this position is not supported. The uncertainty in the grid connection offers process is acknowledged by the applicant in their response at LCC-014, with reference to their justification for seeking a seven-year commencement period.	The Applicant's response to this matter is set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-16, row 16.8.

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.6	Schedule 14 Procedure for Discharge of Requirements	<u>Timescales</u> Paragraph 2(2) The proposed period for determination of applications submitted to discharge a requirement is six weeks. LCC would contend that this period is too short, given the potential complexity and scale of the applications to be considered and the need for effective consultation (where specified), and is also inconsistent with the determination period given in many other made DCOs within Lincolnshire, which are almost exclusively set at 10 weeks (namely Mallard Pass, Heckington Fen, Tillbridge, One Earth, Beacon Fen, Outer Dowsing, Springwell, West Burton, Gate Burton). A notable exception to this is Cottam, where the determination period is set at 13 weeks.	The **Draft DCO** (Doc Ref. 3.1 Rev 3) has been updated at Deadline 3 to increase the determination period for applications to discharge requirements from six week to ten weeks. This aligns with the approach taken in a number of recently made solar DCOs, including Green Hill, One Earth, Tillbridge, West Burton, Gate Burton, Springwell, Mallard Pass, Heckington Fen and Beacon Fen. The Applicant considers that the revised ten-week period strikes an appropriate balance between allowing sufficient time for consultation and determination while ensuring the timely discharge of requirements.
3.7	Schedule 14 Procedure for Discharge of Requirements	Similarly, the proposed timescales relating to Further Information and Consultation are considered by LCC to be too short and inconsistent with a host of other made DCOs. Under para 3(2), a period of 20 working days from receipt of application would be more appropriate rather than 10 working days. Equally, under Para 3(3), it is suggested that the timescales are amended here also, to tie in	Having considered LCC's comments, the Applicant has amended the **Draft DCO** (Doc Ref. 3.1 Rev 3) at Deadline 3 to provide a period of 15 working days under paragraph 3(2), consistent with the timeframe relevant timeframe in the Green Hill Solar Farm Order 2026 and Springwell Solar Farm Order 2026. The Applicant considers that this addresses LCC's concern that the current period is

Reference	Topic	Summary of Matters Raised	Applicant's Response
		with a proposed 20 working day period in para 3(2), such that the text would read: *If the provision governing or requiring the application specifies that consultation with a requirement consultee is required, the relevant planning authority must issue the consultation to the requirement consultee within 10 working days of receipt of the application, and must notify the undertaker in writing specifying any further information the relevant planning authority considers necessary or that is requested by the requirement consultee within 10 working days of receipt of such a request and in any event within 20 working days of receipt of the application (or such other period as is agreed in writing between the undertaker and the relevant planning authority).*	too short whilst maintaining an efficient discharge process. In respect of paragraph 3(3), the Applicant has amended the Draft DCO to retain the requirement for consultation to be issued within 5 working days of receipt of the application, whilst extending the period for requesting further information to 10 working days and providing an overall consultation period of 20 working days. The Applicant considers that this strikes an appropriate balance between allowing consultees sufficient opportunity to review applications and maintaining a proportionate and efficient requirements discharge process.
3.8	Schedule 14 Procedure for Discharge of Requirements	LCC note errors at paras 2(3) and 2(5), where they each should refer to the 'period set out in subparagraph (2)', not subparagraph (1). LCC note that there is no time period specified under paragraph 4(2)(a) within which the undertaker can make an appeal.	The drafting at paragraphs 2(3) and 2(5) has been corrected at Deadline 3 to refer to the period specified in paragraph 2(2). In addition, paragraph 4(2)(a) has been amended at Deadline 3 to include a time period within which the undertaker may make an appeal.

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.9	Schedule 14 Procedure for Discharge of Requirements	Fees In line with our LIR comments, LCC would contend that the amounts shown in 5(2)(a), 5(2)(b) and 5(2)(c) should be uplifted in line with more recently made DCOs (e.g. Springwell), as follows: (a) £2,578 rather than £2,535 (b) £588 rather than £578 (c) £298 rather than £145 We would suggest that the higher fees stipulated in 5(2(a) should apply to the first submission of all Requirements listed in Schedule 2 (i.e. the list of requirements should be extended to include Requirement 4 (Community Liaison group); 10 (Surface and foul water drainage); 12 (Construction Environmental Management Plan); 17 (Public Rights of Way) and 20 (Skills, Supply Chain and Employment).	The Applicant's response to this matter is set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-16, row 16.14.
3.10	Schedule 14 Procedure for	Additionally, LCC would like to see the following sub-paragraph 5(2)(3) inserted to safeguard against inflationary effects and ensure that the fee amounts keep pace with	The Applicant's response to this matter is set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-16, row 16.14.

Reference	Topic	Summary of Matters Raised	Applicant's Response
	Discharge of Requirements	other planning fees uplifts, particularly given the potential duration of this project and the proposed 7 year implementation period. *(3) Where an application under sub-paragraph (1) is made and a fee payable on or after 1 April 2025, then section 18A of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits)(England) Regulations 2021 (as amended by the Town and Country Planning (Fees for Application, Deemed Applications, Requests and Site Visits)(England) Amendment Regulations 2023) will apply as modified by this Order, so that "the relevant amount" means the fee payable under sub paragraph 2(a), 2(b) or 2(c) above.* This would bring the dDCO for Meridian in line with other recently made DCOs that have this provision embedded within them.	
3.11	HRA	LCC notes the updates to the HRA and welcomes the additional information provided and analysis relating to potential disturbance of birds and the identification of Functionally Linked Land (FLL) (Appendix 3). LCC defers to Natural England (NE) on matters relating to the Habitats Regulations Assessment, but	The Applicant has updated **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2) for Deadline 3 to provide a more precautionary approach to the screening of FLL, in accordance with comments received from Natural England (refer to Table 2-4 of this document). The Applicant will continue engagement with Natural

Reference	Topic	Summary of Matters Raised	Applicant's Response
		notes that despite significant counts of birds being recorded in some areas, the land has not been identified as FLL with limited justification provided. LCC considers that additional information and justification is required about how FLL has been identified.	England on these matters, as tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13 Rev 1).
3.12	Biodiversity Net Gain Report	LCC has reviewed the updated Biodiversity Net Gain (BNG) (REP1-059) report and has the following comments to make: • LCC notes the updates to the predicted levels of BNG to be delivered. • LCC agrees with the precautionary approach to the classification of grassland under and around the panels as set out at 4.3.8. • Strategic Significance of some baseline hedgerows has not been applied correctly in the Statutory Biodiversity Metric. Once a Local Nature Recovery Strategy (LNRS) has been adopted, baseline habitats must be set to low strategic significance. • Strategic Significance of created hedgerows has not been applied correctly in line with the Greater Lincolnshire LNRS. High strategic significance should only be applied where the habitat being created is consistent with a	The Application was submitted with the supporting BNG assessment prior to the publication of the Greater Lincolnshire LNRS in July 2026, and it was therefore appropriate at the time to use the approach adopted in the **BNG Report** [REP1-059] in line with the Statutory Metric Guide. The biodiversity net gain strategy to be produced as part of detailed design post-DCO consent, in accordance with Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 3), will update calculations for the Scheme and will incorporate the latest Greater Lincolnshire LNRS strategic significance criteria. In any case, in accordance with Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 3), the Scheme has committed to providing a minimum of 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units

Reference	Topic	Summary of Matters Raised	Applicant's Response
		mapped action in the Greater Lincolnshire LNRS.	and a minimum of 10% biodiversity net gain for watercourse units.
3.13	Outline Landscape and Ecology Management Plan	LCC notes the updates in REP1-070 and welcomes the additional information and clarification provided. LCC considers that additional detail is required on reporting arrangements in the oLEMP. This is particularly in relation to habitat establishment and BNG. Local Planning Authorities will have an important role in auditing the successful delivery of BNG proposed by the project and clear reporting arrangements therefore need to be established. As set out in Lincolnshire County Council's Local Impact Report (REP1-106, 10.25-10.27), LCC suggests the Applicant considers establishing an Ecological Steering Group or similar for the proposed development which could from part of the reporting arrangements. Details of funding arrangements to cover LPAs monitoring of BNG/ecological mitigation and enhancement measures should also be included in the oLEMP.	The Applicant has updated the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref. 7.16 Rev 2) for Deadline 3 to commit to establishing an Ecological Steering Group (ESG), with the remit of the ESG set out within Section 6 of the **OLEMP** (Doc Ref. 7.16 Rev 2).

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.14	Environmental Mitigation & Commitments Register (Rev 2) (Tracked) [REP1-058]	We welcome the commitment within the Environmental Mitigation and Commitments Register under CH-4 Archaeological Mitigation and Management Strategy to set out a Public Archaeology and Engagement Strategy. The role of Archaeological Clerk of Works should be set out within the Commitments Register, in the same way that the Ecological Clerk of Works has been (Ref LVIA-1). We note that there are mitigation commitments which may have archaeological implications and should be included within the Archaeological Clerk of Works remit. These include the 400% BNG for hedgerow units (Ref EC-4), the permissive path along the boundary of the Cate's Cove Corner Scheduled Monument (Ref HH-1), if intrusive ground works are needed, the construction of water course crossings (Ref HF-1) and the temporary drainage system (also HF-1). Where flood risk mitigation is proposed through plinths, bunds or walls (Ref HF-4), impacts on areas of previously unmitigated archaeological remains should be considered.	The role of the Archaeological Clerk of Works is secured through the **Outline Archaeological Mitigation and Management Strategy** (**OAMMS**) (Doc Ref. 8.7 Rev 1), with references to it also included within the **OCEMP** (Doc Ref. 7.10 Rev 3), **OOEMP** (Doc Ref. 7.11 Rev 2), **Outline Decommissioning Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 2), **OLEMP** (Doc Ref. 7.16 Rev 2) and **Outline Soil Management Plan (OSMP)** [REP1-068]. The **Environmental Mitigation and Commitments Register** [REP1-057] is a summary of commitments made across, and secured within, the Application, but is not in itself a securing mechanism, and does not provide the full detail for each mitigation measure committed to. The Applicant considers that the role of the Archaeological Clerk of Works has been sufficiently secured through the management plans submitted with the Application. Mitigation commitments regarding impacts on archaeological deposits as a result of landscape and ecological management works is captured within paragraph 4.1.3 of the **OAMMS** (Doc Ref. 8.7 Rev 1). Further clarification regarding the water course crossing and temporary drainage

Reference	Topic	Summary of Matters Raised	Applicant's Response
		There should be consideration of heritage skills and employment opportunities within the Outline Skills, Supply Chain and Employment Plan (Ref SE-1).	systems has been added to the same section for Deadline 3. The role of the Archaeological Clerk of Works, and their authority to intercede where the mitigation commitments may have archaeological implications, is set out in paragraph 1.4.4, 4.4.11 and 5.2.1 of the **OAMMS** (Doc Ref. 8.7 Rev 1). Table 2-5 of the **OSSCEP** (Doc Ref. 7.17 Rev 2) describes the potential jobs and skills required to deliver the Scheme. Additional explicit references to jobs and skills relating to heritage and archaeology have been inserted for Deadline 3. The Applicant confirms that the activities identified within Section 4 of the **OSSCEP** (Doc Ref. 7.17 Rev 2), which aim to maximise skills and opportunities for local residents, would apply to heritage and archaeological roles, as well as to the other roles set out in Table 2-5.
3.15	7.14 Outline Soils Management Plan (Rev 1) (Tracked) [REP1-069]	We have some concerns regarding the level of decommissioning, with below ground concrete foundations only being removed to a depth agreed with the landowner (Section 2.6.1 of Volume 7: 7.14 Outline Soil Management Plan. This may limit the opportunities for further archaeological surveys in the future.	In locations where a concrete foundation will be required such as substations, BESS compound, solar stations and pylon bases a proportionate mitigation in regard to the impact on buried archaeological deposits has been detailed in the **OAMMS** (Doc Ref. 8.7 Rev 1) Section 4.1 and 4.2. The archaeological evaluation works undertaken

Reference	Topic	Summary of Matters Raised	Applicant's Response
		We would need further input and detail of the decompaction strategy once known (Volume 7: 7.14 Outline Soil Management Plan Section 4.1.3). Where drainage is laid below track and compound hardstanding (Volume 7: 7.14 Outline Soil Management Plan Section 5.3.2), it is important that archaeological impacts have been assessed and mitigated. Where the decommissioning stage requires subsoil decompaction and loosening to a depth of 30cm (Volume 7: 7.14 Outline Soil Management Plan Section 5.7.2), it may be necessary for the Archaeological Clerk of Works to ascertain if archaeological mitigation is required.	to date and future phases of archaeological evaluation and mitigation completed during the pre-construction and construction phase, will result in the cultural significance of the deposits being understood. It is anticipated that there will be no further impact to the archaeological significance of these deposits as a result of the removal of these concrete foundations. This phase of archaeological mitigation will remove the need for further archaeological surveys in the future, as the archaeological deposits will have been recorded and the results made available to others. In addition, to reduce the risk of previously undisturbed archaeological deposits being impacted, all decommissioning activities are to be reviewed by an Archaeological Clerk of Works (ACoW) as defined in section 6 of the **OAMMS** (Doc Ref. 8.7 Rev 1) and the **ODEMP** (Doc Ref. 7.12 Rev 2). The methodology for the removal of the concrete foundations will be undertaken following best practice and guidance. In accordance with Historic England guidance[1] on preservation in situ, there may be circumstances where leaving foundation elements below an agreed depth would result in less archaeological

Reference	Topic	Summary of Matters Raised	Applicant's Response
			harm than complete extraction. This will be informed by the cultural significance of archaeological deposits. Should it be identified by the ACoW that the foundation decommissioning activities may result in an impact on the cultural significance of previously undisturbed archaeological deposits, proportionate mitigation measures will be implemented. The **OAMMS** (Doc Ref. 8.7 Rev 1) has been developed in consultation with the Archaeological Advisor for LCC and Historic England and specific archaeological works during the decommissioning phase will be agreed with the Archaeological Advisor for LCC. Archaeological mitigation in relation to drainage below tracks and compound hardstanding is captured within Section 4 of the **OAMMS** (Doc Ref. 8.7 Rev 1). Section 4 of the **OAMMS** (Doc Ref. 8.7 Rev 1) sets out the requirement for any activities, including subsoil decompaction and loosening, required during the decommissioning phase to be reviewed by the Archaeological Clerk of Works and appropriate archaeological mitigation measures implemented, if required.

Reference	Topic	Summary of Matters Raised	Applicant's Response
			The requirement for the Archaeological Clerk of Works to be consulted in relation to these activities has also been added to paragraphs 4.1.3 and 5.7.2 of the **OSMP** (Doc Ref. 7.14 Rev 2) issued at Deadline 3.
3.16	7.16 Outline Landscape and Ecology Management Plan (Rev 1) (Tracked) [REP1-071]	We note within the Outline Landscape and Ecology Management Plan that there is a requirement for the Applicant and Appointed Contractor to keep the appointed ecologist / landscape architect / arboriculturist informed of work activities that require support and supervision, so that it is clear when attendance is required (Section 1.4.2). This requirement should be added to the Outline Archaeological Management and Mitigation Strategy [REP1-078] under the Archaeological Clerk of Works role (OAMMS Section 5.2). We require further details where the OLEMP states that "Standard environmental practice and mitigation will be implemented to ensure construction and operation of the Scheme complies with legislation relating to protected species" (Section 4.3.3). Standard environmental practice and mitigation may have archaeological implications.	This wording has been added to paragraph 1.4.3 of the **OAMMS** (Doc Ref. 8.7 Rev 1). Mitigation commitments regarding impacts on archaeological deposits as a result of landscape and ecological management works, including standard environmental practice and mitigation. are captured within Sections 4.1 and 4.2 of the **OAMMS** (Doc Ref. 8.7 Rev 1). Standard environmental practice and mitigation measures in relation to protected species referred to within paragraph 4.3.3 of the **OLEMP** (Doc Ref. 7.16 Rev 2) include the measures set out within Table 3-5 of the **OCEMP** (Doc Ref. 7.10 Rev 3) under 'standard and good practice control measures', e.g. prevention of surface and ground water pollution, fugitive dust management, noise prevention or amelioration.

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.17	7.16 Outline Landscape and Ecology Management Plan (Rev 1) (Tracked) [REP1-071]	We welcome the commitment that "All landscape and ecological management works will be undertaken with reference to the Outline Archaeological Mitigation and Management Strategy, secured in accordance with Requirement 11 of the Draft DCO (Doc Ref. 3.1)" and that *"Where works are proposed that may impact on important deposits of archaeological interest, mitigation works may be required in advance of the works progressing. Details of this work will be included in the detailed LEMP"* (Section 5.1.3). Likewise, the commitments made within the Outline Construction Environmental Management Plan Table 3-4 are welcome. We would stress the need for the Archaeological Clerk of Works to be embedded within all aspects of the construction phase. Archaeological impacts may arise from changes in works programmes, works locations or when unexpected constraints arise for other disciplines, evolving mitigation measures may have unanticipated consequences on archaeological remains and it is important that the Archaeological Clerk of Works is made aware of any changes.	The Applicant welcomes these comments. The requirement for the Archaeological Clerk of Works embedded within all aspects of the construction phase is detailed within the **OAMMS** (Doc Ref. 8.7 Rev 1). Paragraph 1.4.3 states that the Applicant or their Principal Contractor (PC) will appoint an Archaeological Clerk of Works for the Scheme prior to the commencement of the outstanding evaluation and mitigation phases. The Applicant or their PC is required to keep the Archaeological Clerk of Works informed of work so that it can be determined when support, advice and or works from an archaeologist is required. It is also stated in paragraph 1.4.11 that the Archaeological Clerk of Works will attend weekly meetings with the construction team to discuss any variation to the construction scope and programme that would require an alteration to the proposed mitigation. The requirement and responsibilities for an Archaeological Clerk of Works during the construction phases will be confirmed in the detailed Archaeological Mitigation and Management Strategy (AMMS). Reference to undertaking works in accordance with the detailed AMMS and monitoring by an

Reference	Topic	Summary of Matters Raised	Applicant's Response
			Archaeological Clerk of Works, was included within the **OOEMP** (Doc Ref. 7.11 Rev 2) and the **ODEMP** (Doc Ref. 7.12 Rev 2) at Deadline 1. Cross reference to the **OAMMS** (Doc Ref. 8.7 Rev 1) and works to be supervised by an Archaeological Clerk of Works, where required, was added to the **OSMP** (Doc Ref. 7.14 Rev 2) at Deadline 1.
3.18	Outline Decommissioning Environmental Management Plan	We are pleased to see the inclusion of archaeology and cultural heritage within the Outline Decommissioning Environmental Management Plan (Table 3-4) [REP1-066]. However, we note that the Mitigation/Enhancement Table states that "No previously undisturbed land will be disturbed within the Order Limits to deliver decommissioning activities" and "*Further archaeological evaluation may be required in the event that ground disturbance does not occur in the same locations as during construction*" and would require the Archaeological Clerk of Works to be informed of any decommissioning activities that may result in the disturbance of unevaluated or mitigated land. We would consider a paragraph similar	Table 3-4 of the **ODEMP** (Doc Ref. 7.12 Rev 2) has been amended in response to this comment for Deadline 3. The requirement for an Archaeological Clerk of Works to be available during the decommissioning phase has been included in paragraph 1.4.4 and Section 6 of the **OAMMS** (Doc Ref. 8.7 Rev 1).

Reference	Topic	Summary of Matters Raised	Applicant's Response
		to the Ecological Clerk of Works in Table 3-5 is needed for the Archaeological Clerk of Works. The roles are broadly similar to each other and the scope of the ACoW role needs to be set out robustly.	
3.19	Socio-economics	LCC-099 – The Council acknowledge the Applicant's response, and explanation. As we identified, 855 is a peak number of workers, the 650 peak for solar development areas and inter-array connections is also a significant number. While, as previously stated, the 60 minute drive time is established using a standard method, we would still stress that this is used with caution. In particular, we have concerns that Wellingborough would be outside the 60 minute drive, reducing the pool of bedspaces and 'local' employees. A simple google journey planner search at 2.20 on a Thursday afternoon identified that Wellingborough is 1 hour and 3 minutes from the application site.	The Applicant notes the Council's comments. The 60-minute drive time is a standard and widely used method for defining travel-to-work and accommodation study areas in NSIP socio-economic assessments, and the Applicant maintains that it has been applied appropriately in this instance. The Council's comments regarding the Google journey planner search are noted. The two hotels in Wellingborough included within the assessment, the Premier Inn and Travelodge, are both located in an accessible location adjacent to a strategic road (the A45), and the Applicant therefore considers it reasonable to include these two hotels within the accommodation capacity figures within **ES Chapter 14: Socio-Economics and Land Use** [APP-065]. In any event, Wellingborough's contribution to the accommodation capacity is limited. As indicated above, of the major hotels (50+ rooms) within the

Reference	Topic	Summary of Matters Raised	Applicant's Response
			60-minute drive time included in the analysis, Wellingborough accounts for only two hotels, providing 142 rooms, representing a small proportion of the 6,543 rooms assessed across all towns within the study area. Were Wellingborough to be excluded from the assessment entirely, this would not materially affect the conclusion that sufficient accommodation capacity exists within the study area to accommodate the Scheme's peak construction workforce, as set out in Table 14-22 of **ES Chapter 14: Socio-Economics and Land Use** [APP-065].
3.20	Socio-economics	LCC-100, LCC101 – The Council acknowledge the Applicant's response and direction to various chapters within the ES. While we appreciate the points raised, the increase in overhead cables and the visual effects will impact upon the public perception of the Lincolnshire, and in particular the fenland landscape. This impact in perception has a real potential to impact upon the visitor economy and its value to the County. As stated in the Applicant's response, there will be no direct impact on Springfields Gardens themselves, however, the visual impact on the main routes	The Applicant has reviewed the Council's comments on the approach to Springfields Gardens from the north in light of the visual assessment set out in **ES Appendix 12-6: Visual Assessment** [APP-240]. The most relevant viewpoints are Viewpoint 27 (view southeast from the River Welland eastern embankment, near the junction of Marsh Road and The Chase) and Viewpoint 30 (view southeast from PRoW Wstn/6/1 at the River Welland eastern embankment), both within the Weston area. Both viewpoints are assessed as experiencing a moderate adverse (significant) visual effect,

Reference	Topic	Summary of Matters Raised	Applicant's Response
		to and from the Gardens will undoubtably be significant especially if approaching from the north via the A16. In addition, the long fenland views will also suffer undoubtable impact, especially when considered in combination with the potential Grimsby to Walpole and Weston Marsh to East Leicestershire projects, all of which will pass through the proposed Weston Marsh Substations.	principally from the Grid Connection Route's 400kV overhead line, which is considered to remain significant at Operation Year 15 as mitigation planting would not provide sufficient screening of the overhead line given its height. However, the Applicant notes that both of these viewpoints are considerably closer to the Scheme than the A16 itself as it approaches Spalding and Springfields Gardens from the north. Viewpoint 27 is located approximately 950m from the Scheme boundary and Viewpoint 30 approximately 415m, reflecting their position on local roads and Public Rights of Way in the Weston area in reasonably close proximity to the Grid Connection Route. The Applicant notes the general conclusion **in ES Chapter 12: Landscape and Visual** [APP-063] that effects are localised in proximity to the Scheme and diminish with distance. From Viewpoint 25, on the eastern edge of Spalding close to Springfields Gardens, the assessment concludes that the Scheme would not be visible at any stage, being fully screened by existing intervening vegetation along the A16 and beyond, resulting in no change to the view (neutral, not significant) throughout the lifetime of the Scheme.

Reference	Topic	Summary of Matters Raised	Applicant's Response
			Regarding the cumulative effects on the fenland views, the assessment within **ES Appendix 12-7: Landscape & Visual Cumulative Assessment** [APP-241] confirms that the Scheme's own additional contribution to cumulative landscape change within these character areas, when considered within the context of the other cumulative schemes, is assessed as minor adverse (not significant) in WSH6 and FEN2, and negligible adverse (not significant) in WSH4. However, the Applicant confirms that the totality of construction activity across all cumulative schemes, including Grimsby to Walpole and Weston Marsh to East Leicestershire, within WSH6 and WSH4 is assessed as moderate adverse (significant), reflecting the concentration of multiple consented and proposed infrastructure projects within the southern part of these landscape character zones, including at the Weston Marsh substations referred to by the Council. The Applicant does not dispute this finding, which is already reported within the cumulative assessment. The Applicant notes that this significant cumulative effect reflects the combined presence of all of the identified schemes within these

Reference	Topic	Summary of Matters Raised	Applicant's Response
			landscape character zones, rather than being attributable to the Scheme considered in isolation, and that the assessment identifies the Scheme's additional effect to that introduced by the other cumulative schemes as minor or negligible in each case. The Applicant also notes that, as set out in the **OLEMP** (Doc Ref. 7.16 Rev 2), mitigation planting has been designed so that there are no unobstructed views of the On-Site Substation Compounds from residential properties and Public Rights of Way in the surrounding area, and that the design and siting of the On-Site Substation Compounds has had regard to the limited opportunities for landform or existing screening within the flat fenland setting. The Applicant confirms that this mitigation forms part of the basis for the conclusion in **ES Chapter 12: Landscape and Visual** [APP-063] that the Scheme's own significant effects are localised and diminish with distance, notwithstanding the cumulative effects identified above, which arise irrespective of the Scheme's own mitigation, given that they reflect the presence of the other schemes independently of the Scheme. Ultimately, the Applicant concludes that the Scheme's visual impact on the approach to

Reference	Topic	Summary of Matters Raised	Applicant's Response
			Springfields Gardens, and cumulatively on the fenland landscape, would not result in a significant effect on the visitor economy or tourism in Lincolnshire.
3.21	Socio-economics	LCC-103, LCC-104 – This is still a considerable area of concern. While we appreciate that issues such as peak workforce may well not overlap, there is significant potential for this to occur. Therefore, this should be considered as a significant 'what-if' scenario to ensure that should overlaps occur potential issues have been identified and potential mitigation measures identified in advance. An awareness of schemes overlapping with multiple others is required. This is in terms of 60 minute drive time, demand for workforce and temporary accommodation. In respect of those schemes close to the coast, we would highlight to the applicant to be aware that these naturally have a restricted pool of all of the above from the outset. While not necessarily the case for this scheme, potential impacts from overlapping schemes	The Applicant confirms that **ES Chapter 14: Socio-Economics and Land Use** [APP-065] already tests the "what-if" scenario the Council describes, by assuming that the peak construction workforce of every cumulative scheme identified occurs simultaneously (i.e. the worst-case scenario). The assessment sums the total peak FTE staff requiring accommodation across all cumulative solar and grid-connection NSIPs within 30km (1,815 workers), applying the same 60% leakage assumption used for the Scheme, and tests this total against the supply of major hotel rooms (50+ rooms, excluding luxury hotels) within 60 minutes' drive. The ES is explicit that this represents a worst-case scenario, as it is unlikely that all projects would in practice share an identical construction programme. Under this worst-case scenario, Table 14-27 confirms that major hotel capacity within the 60-minute drive time would be fully utilised in eleven of twelve months, with a shortfall of 834 rooms

Reference	Topic	Summary of Matters Raised	Applicant's Response
		are not clear cut and may be skewed as a result of cumulative impacts. As demonstrated by the examples provided in the table below, there is the likelihood that among the schemes closest to the proposed project, and with overlapping travel time boundaries there will be noticeable overlap in construction periods. It is also likely that should any of these examples experience delays that there will be overlap with the applicant's scheme. While each NSIP will have a slightly different travel to work area (which we do not dispute), it is inevitable that there will be overlaps in demand. When the lack of chain hotel provision to the east of the A15 is taken into account it is clear that projects are going to have to be well coordinated and work together to ensure that it is possible to secure accommodation for the temporary workforce, that also does not impact on the tourist or other business demand for accommodation in the county. It is essential that the applicant understands and works with the limitations posed within and by Lincolnshire as a large	(13% of total major hotel capacity) at peak occupancy in July. However, the assessment also adopts a deliberately conservative approach to the accommodation supply available to meet this demand, in two respects. First, it includes only major hotels with 50 or more rooms, excluding all smaller hotels, bed and breakfast establishments, and inns, despite the **ES Chapter 14: Socio-Economics and Land Use** [APP-065] baseline noting that the Fenland area is served by "small bed and breakfast and inn accommodation spread across the local area". Second, it does not quantify the private rented sector as a source of accommodation. When capacity in hotels with under 50 rooms within the 60-minute drive time is added to the assessment, an additional 8,741 rooms become available, bringing total capacity to 15,284 rooms. Under this scenario, even at the highest-occupancy month of July, there would be spare capacity of 478 rooms (3%) across all cumulative schemes, including the Scheme. This does not account for any further capacity that would be available through the private rented sector, which has not been quantified.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		rural county that is facing a period of very high construction activity. With respect to the Outline Skills, Supply Chain and Employment Plan (oSSCEP) (Rev 1) [REP1-073] and inclusion of Requirement 20 in the draft DCO, LCC would reiterate the comment made in its LIR [REP1-106] at 16.15 that if there is to be reliance on this plan to provide key benefits for the lifetime of the development, then there needs to be some form of funding mechanism by which the objectives of the oSSCEP can be delivered. In Lincolnshire similar contributions have been provided by way of a section 106 agreement for other solar NSIP schemes, for example, Heckington Fen and Springwell.	The Applicant considers that this demonstrates both that the worst-case cumulative scenario the Council describes has already been tested, and that the accommodation pool actually available in Lincolnshire, once smaller establishments and the private rented sector are taken into account, is likely to be substantially larger than the major-hotel-only figures in Table 14-27 suggest. As set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-10, ref. 10.10, the Applicant will continue engagement with LCC through the Community Benefit Fund on where any strategic funds can be directed subject to the receipt of more detail on the funding request from the LCC to ensure that it aligns with the aims of the Community Benefit Fund to deliver direct benefits to the local community affected. In any event, the Applicant confirms that delivery of the commitments set out in the **Outline Skills, Supply Chain and Employment Plan** (OSSCEP) (Doc Ref. 7.17 Rev 2) is not contingent on the establishment of any such additional funding mechanism. These measures are secured through Requirement 20 of the **Draft DCO** (Doc Ref. 3.1 Rev 3) and will be delivered by the Applicant and contractors as part of the Scheme

Reference	Topic	Summary of Matters Raised	Applicant's Response
			regardless of whether a supplementary funding arrangement of the kind suggested by LCC is put in place.
3.22	Human Health	Public Health remains cautious regarding the conclusion that the overall impacts on human health and mental wellbeing will predominantly be minor or not significant. The ES itself identifies significant environmental effects for some receptors, including construction noise and landscape and visual effects, as well as significant cumulative visual effects for some residential and recreational receptors. Assessing and predicting impacts on mental health and wellbeing is inherently challenging. People's responses to environmental change vary according to factors including existing health, personal circumstances, attachment to place, duration of exposure and the cumulative effects of other changes within their community. Effects may also emerge over time. There therefore remains uncertainty as to whether the predicted minor adverse effects will fully reflect the lived experience of residents and communities most affected by the Scheme, particularly where	**ES Chapter 10: Human Health** [APP-061] acknowledges and refers to various significant adverse effects which are identified in other chapters of the ES which are relevant to health. However, **ES Chapter 10: Human Health** [APP-061] has followed best practice guidance to assess the health impacts of the Scheme and to conclude that no significant adverse effects on human health would result. The Applicant acknowledges that individuals respond in various ways to environmental change, and that assessing impacts on mental health and wellbeing is inherently challenging. However, **ES Chapter 10: Human Health** [APP-061] adopts a proportionate approach, following best practice guidance and a scope which reflects consultation with the Local Planning Authorities and the local community. **ES Chapter 10: Human Health** [APP-061] identifies population groups which may be more sensitive to change than others and incorporates a consideration of these vulnerable

Reference	Topic	Summary of Matters Raised	Applicant's Response
		they experience prolonged or cumulative change. Public Health would caution against interpreting a population-level conclusion of "not significant" as an absence of meaningful health and wellbeing impacts at an individual, household or community level. This is particularly relevant where a relatively small number of residents may experience substantially greater effects than the wider population.	groups into the assessment, in line with best practice guidance.
3.23	Human Health	The proposed Community Liaison Group and Community Liaison Officer is welcomed. However, Public Health requests a specific commitment to periodically review health and wellbeing concerns during construction, drawing on community engagement, complaints and relevant monitoring. Particular attention should be given where clusters or patterns of concerns emerge, or where communities are simultaneously affected by other major infrastructure works. Where concerns are identified, there should be a mechanism for review with relevant local authorities and consideration of additional or	As set out in Requirement 4 of the **draft DCO** (Doc Ref. 3.1 Rev 3), the terms of reference of the Community Liaison Group will be agreed with and must be approved by the relevant planning authority prior to the commencement of the authorised development. The Community Liaison Group will be established prior to commencement of the authorised development, and is to continue to meet until the date of final commissioning of the final part of the authorised development unless otherwise agreed with the relevant planning authority. In accordance with paragraph 2.21 of the **OCEMP** (Doc Ref. 7.10 Rev 3), a Community Liaison

Reference	Topic	Summary of Matters Raised	Applicant's Response
		adapted mitigation where reasonably practicable.	Officer will lead engagement with local communities through the Community Liaison Group and act as the primary point of contact for queries or complaints throughout the construction period. Complaints will be monitored and reported to the Applicant for immediate investigation and action. A display board will be installed on-site, and a website will be set up. These will include contact details for the Community Liaison Officer or alternative with whom nuisance or complaints can be lodged. A logbook of complaints will be prepared and managed by the Site Manager.
3.24		Overall, Public Health considers that the principal matters raised previously are considered within the ES. However, whilst acknowledging the applicant's conclusions, Public Health is not able to conclude with the same degree of certainty that health and wellbeing effects will remain minor or not significant, particularly for communities and vulnerable residents experiencing the greatest direct and cumulative change. Continued monitoring, meaningful community engagement and a responsive approach to mitigation will therefore be important to	The Applicant refers to its response at ref. 3.23 above. Meaningful engagement with the local authorities and communities surrounding the Scheme would continue post DCO consent, including via the Community Liaison Group.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		ensure that unforeseen or greater-than-predicted effects are identified and addressed.	
3.25	Post ISH1 Note: Community Benefit Fund, September 2026 [REP1-100]	Para 3.1.3 – LCC note the reference to a lower CBF rate for solar projects of between £700 - £1000 per MW of installed capacity, recognising the lower load factor of solar developments compared to onshore wind. The currently proposed £500,000 per year would fall below the lower end of this range for Meridian's 750 MW installed capacity but we welcome and acknowledge the applicant's commitment to revisit appropriate guidance once issued to ensure the CBF rate is in alignment at the relevant time.	The proposed community benefit is subject to final investment decisions, based on detailed design and project commitments made through the development lifecycle of the project. The Applicant is committed to delivering a CBF as it does on many other schemes, and the draft values proposed are consistent with those offered elsewhere. The Applicant will continue to monitor industry and government guidance as it emerges on CBF.

AAH (Landscape and Visual)

2.3.2. The following table provides a response to any new or unresolved matters the AAH's Deadline 2 comments [REP2-020] which were submitted on behalf of LCC.

Table 2-2 Responses to new queries raised in the AAH Deadline 2 Submission on behalf of LCC

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.26	Responses to South Holland District Council's (SHDC)	Regarding Landscape and Visual Matters and Landscape Character, the Applicant 'maintains its view that while significant adverse landscape and visual effects will	The Applicant disagrees with this characterisation of the statement quoted. The planning balance for the Scheme weighs the residual significant adverse effects against the benefits of the Scheme and its

Reference	Topic	Summary of Matters Raised	Applicant's Response
	comments within the Relevant Representation Report [REP1-074].	attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse effects'. This statement by the Applicant seems to imply that Landscape and Visual issues will not be a determining factor in this application and is therefore of lesser importance. The Applicant has a duty of care to ensure that adverse effects on the landscape and visual setting are minimised, and this statement seems to imply a weak commitment to achieving this.	contribution towards the delivery of urgently needed low-carbon electricity infrastructure. The Applicant has never asserted that landscape and visual effects are not a relevant consideration in the planning balance. Paragraph 6.1.13 of the **Planning Statement** [APP-260] expressly acknowledges that the Scheme would result in residual landscape and visual effects. However, paragraph 4.1.7 of EN-1 makes clear that the need for energy infrastructure is so substantial that, following the application of the mitigation hierarchy, residual adverse effects are likely to be outweighed in all but the most exceptional circumstances. The Applicant considers that it has appropriately applied the mitigation hierarchy and that, whilst the Scheme would give rise to significant adverse residual effects, those effects are not of such significance as to amount to the exceptional circumstances contemplated by paragraph 4.1.7 of EN-1.
3.27		Regarding mitigation, the Applicant 'recognises that these effects cannot be fully mitigated' and that 'the extent and from of planting has been developed to provide targeted screening and landscape integration whilst avoiding extensive new vegetation	The Applicant does not consider the absence of planting along the Grid Connection Route to be an oversight. The LVIA has considered opportunities for mitigation across the Scheme. The Grid Connection Route comprises tall overhead infrastructure which cannot realistically be

Reference	Topic	Summary of Matters Raised	Applicant's Response
		patterns that would themselves adversely affect the characteristic openness of the Fenland landscape'. AAH agree a targeted approach is required but believe more could be done to enhance existing vegetation. For example, the complete omission of the Grid connection corridor from landscape mitigation is an oversight and wasted opportunity for enhancement.	screened by planting, while the relatively narrow Order Limits and operational clearances constrain planting opportunities. Additional planting solely to interrupt views of pylons could introduce uncharacteristic enclosure or isolated vegetation pockets into the open Fenland landscape without materially reducing the identified effects and affecting potentially additional receptors groups, in particular residences, in altering views from the property in close distance and also impacting on land interests. The landscape strategy therefore prioritises siting and routing of the overhead infrastructure and targeted planting, where effective and compatible with landscape character, particularly around lower-level infrastructure. The absence of specific planting along the corridor does not constitute a Scheme-wide 'no mitigation' approach.
3.28		Regarding visual effects, the Applicant dismisses concerns over VP3 and VP14 as 'not representative of other PRoW located with the study area' or 'located at a gap of existing roadside shrubs' that will be closed by proposed mitigation planting. The Applicant does not agree that the scheme would be 'dominant and extensive' from	**ES Appendix 12-6 Visual Assessment** [APP-240] identifies major adverse (significant) visual effects at VP3 during Construction, Year 1, Year 15 and Decommissioning, and so these effects have not been dismissed in the assessment. However, VP3 reflects a particular combination of elevation, proximity to Parcel A and limited opportunities for effective screening, and should not be assumed to

Reference	Topic	Summary of Matters Raised	Applicant's Response
		several public and residential receptor locations. AAH agree that VP3 is different from other PROW as it is elevated and runs along a raised embankment (Barrier Bank / Wash Bank) adjacent to the River Welland. However, these man-made features are characteristic of this locality, and the PROW is well used as it is located between the settlements of Cowbit and Crowland. Changes to the landscape adjacent to this route will have an adverse impact on the amenity of those receptors on this route.	represent the effects on all PRoW across the study area. The proposed planting along the western side of Parcel A would filter views but is not intended to fully enclose this characteristically open route. The Applicant considers the significance and persistence of the effects at VP3 to be appropriately reported, but would reiterate that this viewpoint is not considered representative of other PRoW within the study area.
3.29		Regarding the Grid connection route, 'all landscape and visual effects reported with respect to the Grid connection Route infrastructure are moderate adverse'. The Applicant has understood that only effects that 'exceed moderate adverse' (in EN-5) are considered significant and undergrounding is not required and this approach is consistent with national policy (p30 - RR). It is not clear why the Applicant has applied a higher threshold for significance in this instance when their own LVIA methodology (p21 – Meridian LVIA) shows clearly that moderate effects can be assessed as 'significant'.	The Applicant clarifies that, in accordance with **ES Appendix 12-2: LVIA Methodology** [APP-236], Moderate Adverse effects are classified as significant, representing the lower end of the scale of significant effects, with Major Adverse effects representing a higher level of significance. The Applicant has not applied a higher threshold when determining significance within the LVIA. This comment has misunderstood the Applicant's interpretation and policy assessment against paragraph 2.4.14 of EN-5. The reference to effects exceeding Moderate Adverse relates to the separate consideration of whether the landscape and visual effects of the Grid Connection Route

Reference	Topic	Summary of Matters Raised	Applicant's Response
			are sufficiently substantial to justify undergrounding, having regard to the relevant provisions of NPS EN-5. It is not referencing whether a moderate adverse effect is deemed to be significant or not. Paragraph 2.9.14 of NPS EN-5 states '*Where the nature or proposed route of an overhead line will likely result in* ***particularly*** *significant landscape and visual impacts, as would be assessed through seascape, landscape and visual impact assessment (SLVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line.*' Within this context, the Applicant considers that the effects of the Grid Connection Route are typical of overhead line infrastructure and would not be elevated to the *particularly* significant threshold identified in NPS EN-5. Albeit, nevertheless, due consideration of alternatives to an overhead line has been given, as summarised within **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. This should not be confused with the determination of which effects are significant overall under the LVIA methodology. The LVIA acknowledges the significant moderate adverse effects associated with the Grid Connection Route.

Reference	Topic	Summary of Matters Raised	Applicant's Response
			However, having regard to the nature and extent of these effects, the existing landscape context and the relevant provisions of NPS EN-5, the Applicant does not consider that these effects would trigger the requirement for undergrounding on their own under NPS EN-5.
3.30		Regarding RVAA, the Applicant states that significant effects in an LVIA will not potentially lead to reaching the RVAA threshold. An RVAA is only required when it meets the TGN 2-19 criteria of 'blocking only available views from a property or overwhelming views in all directions or unpleasantly encroaching or being inescapably dominant from the property'. This is inaccurate. P5 of TGN-05 states that 'for properties in (relatively) close proximity to a development proposal, and which experiences a high magnitude of visual change, a RVAA may be appropriate, and may be required by the determining / competent authority'. Looking at P12 of TGN-5, the descriptions quoted by the Applicant, 'overwhelming views' etc. are given as examples of language that can be used – but	The Applicant clarifies that the examples cited from TGN 2/19 are illustrative and are not intended to represent the sole criteria for determining whether an RVAA is appropriate. The guidance indicates that an RVAA may be appropriate for properties in relatively close proximity experiencing a high magnitude of visual change; it does not require a standalone RVAA solely because of proximity or an identified significant LVIA effect. The Applicant's decision not to undertake a standalone RVAA was based on the guidance provided in TGN 2/19, professional judgement, informed by the findings of the LVIA, the iterative design process and the consideration of residential visual effects, including property orientation, separation distances, existing vegetation and proposed mitigation. The Applicant considers that the LVIA and its supporting visualisations provide sufficient information to

Reference	Topic	Summary of Matters Raised	Applicant's Response
		they are not the determining factors - as presented.	assess the effects of the Scheme on residential visual amenity and inform the planning decision. Notwithstanding the above, the Applicant will prepare a Residential Visual Amenity Technical Note for Deadline 4 to set out further explanation of the professional judgements underpinning the existing LVIA conclusions, as requested by the Examining Authority under Question 15.0.26.
3.31	Responses to LCC comments within the Relevant Representation Report [REP1-074].	Regarding the RVAA, the Applicant uses the same argument given to SHDC that significant visual effects identified in the LVIA do not automatically justify an RVAA. The Applicant's decision not to provide an RVAA was a 'reasoned professional judgement' based on guidance, the design evolution of the scheme and on the LVIA. Regarding 'design evolution' the strategy of providing offsets is cited as being sufficient to avoid 'overbearing and intrusive design' impacting on residential receptors. In view of the Applicant's response to SHDC on RVAA (above), AAH would question whether this was the right decision. We would argue that many residential properties are in 'close proximity' to the proposed development (even with setbacks) and that the impact on	The Applicant recognises that a number of residential properties are located relatively close to the Scheme and that setbacks do not, of themselves, eliminate visual effects. The assessment has considered proximity alongside the orientation and availability of views, intervening features, the scale and location of infrastructure, and proposed mitigation. Significant visual effects have been reported, where appropriate. However, the Applicant does not consider that proximity or significance alone establishes the need for a separate RVAA. For the reasons set out in response to Paragraph 3.30 above, the Applicant maintains that the LVIA and supporting visualisations provide an adequate basis for considering residential visual amenity.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		private views should be assessed using the RVAA process.	Notwithstanding the above, the Applicant will prepare a Residential Visual Amenity Technical Note for Deadline 4 to set out further explanation of the professional judgements underpinning the existing LVIA conclusions, as requested by the Examining Authority under Question 15.0.26.
3.32	Responses to comments from members of the public within the Relevant Representation Report [REP1-074].	Regarding cumulative effects, the Applicant's response on p655 is incomplete (paragraph ending in a comma).	The Applicant acknowledges that the earlier response was truncated and clarifies the position. Cumulative landscape and visual effects with other developments are set out within **ES Appendix 12-7 Landscape and Visual Cumulative Assessment** [APP-241] and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** [APP-063]. The assessment considers both the Scheme's additional contribution to cumulative effects and the combined effects of the Scheme with other relevant developments. While the additional contribution is generally assessed as minor adverse (not significant), the assessment also identifies moderate adverse (significant) effects arising from the totality of cumulative development for certain landscape character receptors. The Applicant does not dispute those significant cumulative findings and refers to the detailed receptor-specific conclusions in **ES Appendix 12-7** [APP-241].

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.33	Summary of LCC's comments issued within their LIR.	Comments related to Landscape and Visual issues are located on p30-34. Included in the LIR is a summary of relevant National and Local planning policy, that the Applicant should comply with, and a comprehensive summary of the AAH review of the Meridian Solar proposal under the headings: Methodology and assessment, Landscape baseline and assessment, Visual assessment, Design and mitigation, Cumulative assessment, Figures and supporting information. This summary is concluded with a recap of the key points and concerns, which include: • Concern that there shouldn't be a minimal approach to mitigation in all cases as there is some established vegetation in some locations. VP3 and Whaplode Drove are identified as being suitable for more planting. • Concern that the importance of PROW on South Holland Main drain has been overlooked, with no setbacks, and long-distance routes	The Applicant takes all comments raised seriously. Full responses to LCC's LIR landscape and visual comments are included within Sections 3.3 and 3.17 of the **Applicant's Comments on Local Impact Reports** [REP2-015]. In addition, the Applicant clarifies that, although the Macmillan Way was not separately identified by name on the original **ES Figure 12-3 Public Rights of Way and National Cycle Network** [App-113], the route predominantly follows existing Public Rights of Way which were already shown on the figure and considered within the LVIA. **ES Figure 12-3** [REP2-004] was subsequently updated at Deadline 2 to identify the Macmillan Way explicitly, improving the clarity of the information presented without changing the scope or conclusions of the assessment.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		like the McMillian Way are not keyed in Figure 12-3. • Concern that the impact of the solar arrays on landscape character has generally been understated with loss of 'agricultural land use' and 'openness' not considered with sufficient emphasis. • Concern that the visual assessment seems to be understating the impact of the substations with more explanation on their visual impact required.	
		At this stage (DL1), the Applicant has yet to respond to these issues. AAH have identified specific locations and local issues in the hope the Applicant can use these comments to modify and strengthen their design proposals and assessment reporting. However, the Applicant's responses to the RR seem to dismiss Landscape and Visual concerns as unlikely to be important in the context of the 'planning balance' and the Critical National Policy (CNP) status of the project which is concerning. The Applicant has made no commitment to update or modify their LVIA or design mitigation in response to the RR	The Applicant does not accept that its position on the planning balance indicates that landscape and visual concerns have been dismissed. Significant adverse effects are expressly acknowledged in the ES and have informed the iterative design and mitigation strategy. The Applicant has responded to the Council's specific points through **Applicant's Comments on Local Impact Reports** [REP2-015] and the responses above. A difference in professional judgement regarding the need for further planting or additional assessment, and application of the planning balance, does not indicate a lack of consideration. The Applicant acknowledges that there would be significant

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		feedback. It is hoped feedback in the LIR will be taken more seriously.	residual adverse effects in relation to landscape and visual within the **Planning Statement** [APP-260], however these are not outweighed by the urgent need for low carbon energy infrastructure which are afforded Critical National Priority status. The Applicant maintains that the LVIA and the proposed mitigation are proportionate to the Scheme and its landscape context.
3.34	Concluding remarks.	In conclusion, AAH believe the following Landscape and Visual matters remain at DL1 and should be carried through into SOCG discussions and the Examination. • Concern about under the reporting of the significance of the impact of OHL/Pylons, Solar arrays and substations. • The need for RVAA. AAH believe that RVAA should be requested. • Extent of landscape mitigation. AAH believe that more justification is required to omit the Grid Connection Corridor from the landscape mitigation process.	Responses to the summarised concerns are provided in the rows above or have been addressed within Sections 3.3 and 3.17 of the **Applicant's Comments on Local Impact Reports** [REP2-015] and in the **Relevant Representations Report** [REP1-074]. The Applicant does not consider that the concerns raised by AAH (on behalf of LCC) identify omissions in the submitted LVIA or necessitate further assessment. The LVIA acknowledges significant adverse landscape and visual effects arising from the solar arrays, substations and overhead line infrastructure, including residual effects at Operational Year 15. The significance judgements have been determined in accordance with the submitted LVIA methodology, taking account of

Reference	Topic	Summary of Matters Raised	Applicant's Response
		• The need for more targeted landscape mitigation adjacent to, and to link, existing landscape features • PROW – some of these routes will be adversely affected (see VP3 and VP14). The Applicant is asked to review their approach to mitigation on these sensitive routes to minimise impacts on them. • The need to ensure their offset criteria apply to all PROW routes including South Holland Main Drain. All recommendations in the LIR (including those highlighted above) should be properly reviewed and considered by the Applicant with clarifications given if no action is taken.	receptor sensitivity, magnitude of change and professional judgement. The Applicant also maintains that a separate Residential Visual Amenity Assessment is not required, for the reasons previously provided. Notwithstanding the above, the Applicant will prepare a Residential Visual Amenity Technical Note for Deadline 4 to set out further explanation of the professional judgements underpinning the existing LVIA conclusions, as requested by the Examining Authority under Question 15.0.26. The Grid Connection Route has not been excluded from consideration of landscape and visual mitigation. However, the height and scale of the overhead line infrastructure limit the effectiveness of planting as a screening measure. The Scheme's mitigation strategy therefore combines siting, layout and design considerations with targeted planting where appropriate, particularly where this can reinforce existing landscape features without introducing uncharacteristic enclosure into the open Fenland landscape. In relation to PRoWs and sensitive views, the Applicant has already incorporated targeted mitigation, including planting along the western side of Parcel A in relation to VP3, and advanced

Reference	Topic	Summary of Matters Raised	Applicant's Response
			planting and Habitat Management Areas in the vicinity of Langary Gate Road, Martins Road and South Holland Main Drain. The LVIA considers recreational receptors through representative viewpoints, including LCC5 and LCC6, which were added following consultation with LCC. The Applicant acknowledges that significant residual effects may remain along some routes, notwithstanding the mitigation incorporated. The minimum 50 m offsets identified at Langary Gate Road and Martins Road relate to residential properties and should not be interpreted as a universal setback applicable to all PRoWs. The location of PRoWs, their existing characteristics as found within the study area, and the potential effects on their users have instead informed the Scheme layout and landscape mitigation strategy, taking account of the particular circumstances of each route. The Applicant considers that the submitted assessment and mitigation strategy are appropriate and proportionate. The Applicant agrees that matters raised should continue to be addressed through the Statement of Common Ground process, with outstanding differences in

Reference	Topic	Summary of Matters Raised	Applicant's Response
			professional judgement clearly identified where agreement cannot be reached.

RAC

2.3.3. The following table provides a response to any new or unresolved matters the RAC's Deadline 2 comments [REP2-021] which were submitted on behalf of LCC.

Table 2-33 Responses to new queries raised in RAC's Deadline 2 Submission on behalf of LCC

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.35	ES Chapter 5: Agriculture and Soils	ES Chapter 5: Agriculture and Soils, para 5.5.3. New text sets out a commentary on unsurveyed areas that amount to 11.4% of the Solar Development Area. The surveying of land before development to inform the site Soil Management Plan is accepted as good practice where access to land is not permitted. In the absence of detailed survey to inform ALC grading, it is suggested that the precautionary principle is applied and that all unsurveyed land be graded as Best and Most Versatile.	The Applicant acknowledges that considering unsurveyed land to be BMV land as a worst-case scenario would represent a precautionary approach, however, as Table 5-13 of **ES Chapter 5: Agriculture and Soils** [REP1-014] identifies, the area of permanent land use change within the unsurveyed areas is 1.1 ha. As such, the unsurveyed area is not material to the magnitude of impact threshold categories for proposals for either the permanent or temporary land use change. Assessing the unsurveyed areas as BMV land would not change the assessment of significant effects.
3.36		ES Chapter 5: Agriculture and Soils, para 5.6.7.	The Applicant acknowledges that *Soils of the Boston and Spalding District [Sheet 131]* by J.D. Robson (1990) provides interesting historical

Reference	Topic	Summary of Matters Raised	Applicant's Response
		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 3.6.2. New text: Existing field boundaries have been utilised as ALC grade boundaries where survey evidence indicates differing land quality between adjacent land parcels. This approach recognises the long-term practical management of the agricultural land and reflects the likelihood that field divisions have been established historically in response to differences in land capability, soil characteristics, or operational requirements. Comment: The Boston and Spalding soil map [Appendix 1], published at 1:50,000, clearly shows that there is no relationship between soil type and field boundaries. The fields of the proposed development area are mostly rectangular or trapezoid, with drainage ditches maintained by farmers or the IDB forming the field boundaries. Boundaries in the area are dictated by drainage design and are ideal for spraying, harvesting and irrigation. Operational requirements are not a consideration in determining the ALC grade of a land parcel.	background to soil survey of the area. However, the Applicant notes that the lapse of time since that work was published, together with the heavy dependence of the soils on under-drainage, means that it is a secondary (inferior) resource relative to recent surveys. Robson's work is over 35 years old and conducted with much fewer soil samples than the Applicant's own survey (meaning it is considered less reliable in representing the present-day scenario). RAC on behalf of LCC focuses on the apparent maintenance of open drainage ditches suggesting the ALC would remain the same/similar, but the effectiveness of drainage is also related strongly to the continued maintenance and effectiveness of tile drains and unlined mole drains. Without maintenance and mole drain reinstatement the soils would perform differently from the era of the memoir (and the Crowland, Postlands Estate (ALCC05791) 1991 soil survey of part of the Site). Less effective drainage would strengthen the relationship between field patterns and grade of land. 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

Reference	Topic	Summary of Matters Raised	Applicant's Response
			parts of the Solar Development Area which is a reason why the ALC might have changed over time.
3.37		ES Chapter 5: Agriculture and Soils, para 5.8.9 to 5.8.12 and 5.8.17 to 5.8.19. New Text: …it was agreed with Natural England that the effects of hardstanding on BMV land will be assessed as if permanent. Comment: Re-consideration of permanent effects under hard standing and tree planting is welcome, and it for NE to respond in detail. However, the assessment fails to take into account the likely loss of the benefit of irrigation from the development area. As has been pointed out above, any permanent loss of irrigation is likely to have a permanent impact on cropped land, thus the temporary restriction applied in Table 5-16 in the assessment is incorrect.	Cropping data, presented within Appendix A of the **Applicant's Comments on Local Impact Reports** [REP2-015], indicates that 95% of the land would not be subject to irrigation. Scheduling of irrigation is related to rainfall, but it is crop specific. A five-year average identifies that potatoes and sugar beet account for 5% of the Solar Development Area (with a lower proportion in recent years). It is these crops that would receive irrigation and even in drought irrigation would not be extended to cereals and maize. The Applicant acknowledges that a surrendered abstraction licence may become permanent, albeit there are opportunities for license trading, as explained within the **Water Supply Strategy** [REP2-019]. Importantly though, irrigation is not considered in assigning ALC grades. Soil moisture deficits must be calculated regardless of the availability of irrigation. Hence the assessment of effects on ALC grades and the soil resources has been considered appropriately within **ES Chapter 5: Agriculture and Soils** {REP1-014]. The absence of irrigation over the lifetime of the Scheme would not affect the

Reference	Topic	Summary of Matters Raised	Applicant's Response
			ALC grading within the Site during the operational phase, or post decommissioning (irrespective of whether the land is then irrigated).
3.38	ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C	ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 3.3.3. New Text: Due to the ground conditions at the time of the survey following a period of drought the soil was largely impenetrable by spades: therefore, soil pits were excavated using the sides of Archaeology trenches to variable depths between 50cm and 120cm. Further excavation of these pits was not possible due to ground conditions and the need to avoid archaeological disturbance. Comment: The use of undisturbed archaeological trenches for interpretation of soil profiles is not good practice. Only two synthesised soil profile descriptions are provided (i.e. not actual soil pit descriptions) to represent an area that, whilst mapped with only two soil associations, is mapped with four or more soil series on the map accompanying the Boston and Spalding Soil Memoir; a soil series is a homogenous, containing the same	The Applicant acknowledges the restrictions imposed by soil conditions to excavating standard soil pits and the pragmatic approach to deriving information from archaeological trenches. Although the pits could not be excavated to the full intended depth, they exposed sufficient subsoil for examination of the transition from topsoil to subsoil, and the presence of root channels was explored. The pit logs presented within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] therefore provide relevant supporting evidence of the observed subsoil characteristics, including texture, structure, mottling and permeability indicators. A substantial proportion of the recorded matrix colours were borderline, including 10YR 5/4 and 10YR (or 7.5YR) 3/2. Although these colours may appear visually pale or greyish, they do not fall within the colour parameters used by the MAFF guidance to define a gleyed horizon. The soils were therefore recorded as ungleyed where the observed Munsell colour did not meet gleyed

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		sequence, thickness, and arrangement of soil layers (horizons), along with similar colour, texture, and chemistry, whereas a soil association is a broad group of soil series' with recurring patterns formed on similar parent materials. Thus, it is unlikely that the two synthetic soil profiles are representative of the soils of the development area, compounding issues associated with the inadequate pit depth and lack of open pit faces from which soil characteristics are identified. The interpretation of the available evidence is questionable. All the soils in the development area are alluvial gley soils, yet descriptions of the visible soil profiles in both Pit Log 1 [p68 App5-3] and Pit Log 2 [p69 App5-3] refer to mottles, characteristic of gleyed soils, yet describe both profiles as 'ungleyed'	criteria. Their broader mapping does not override the horizon-specific field assessment undertaken at each observation point. The limitation on digging pits has not impeded characterising the baseline for the assessment of environmental impacts. With the baseline adequately categorised, the Applicant does not consider that further data would have changed the conclusions of the assessment of significant and non-significant effects. Notwithstanding the above, the Applicant has updated the **OSMP** (Doc Ref. 7.14 Rev 2) for Deadline 3 to commit to additional soil pits to be dug alongside an investigation of field drainage to inform the production of the detailed Soil Management Plan post-DCO consent, in order to verify ALC grading. Restoration of soils at decommissioning would be undertaken against the verified baseline.
3.39		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 3.5.1. New Text: During the analysis stage, the ALC grade has been calculated on a point-by-point	The grade of land was not based only on topsoil characteristics, but the topsoil texture is a factor in the assessment. Hence confirmation of field data by laboratory analysis is relevant. The role of wetness in determining the limitation of soils is

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		basis, with features of wetness class (Slowly Permeable Layer and Gleying) analysed from each auger sample. To support the field assessment, laboratory analysis of selected topsoil samples has been undertaken. These provide confirmation of physical characteristics of the soils and have been used alongside field observations to inform the final ALC grading. Comment: The analysis of topsoil samples alone cannot inform the physical characteristics of the underlying subsoil, which it is claimed is the basis for downgrading land, due to the assumed almost universal presence of slowly permeable subsoils in the Type 2 soil.	calculated using table 6 of the MAFF Guidance. The information required for this is the Field Capacity Days, Wetness Class and texture of the top 250 mm of soil. Laboratory analysis was undertaken to confirm distinction between clay-loam and clay topsoils, as this distinction in texture can result in a lower grade.
3.40		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, section 4.5 and 4.6. The description of published sources of information about the soils of the area fails to identify the Boston and Spalding Soil Memoir and accompanying 1:50,000 scale mapping of soils series'. The review refers only to Soils and their use in Eastern England and the accompanying 1:250,000 scale mapping of soil	The use of published materials provides useful information in preparing for field survey of land and soils. ALC guidance does not dictate the extent of background information to be consulted. Notwithstanding this, the field survey undertaken at 1:10,000 spatial resolution is considerably more detailed than any available published material, including the 1:50,000 scale mapping contained within the memoir. The absence of reference to the memoir is not considered a limitation to the

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		associations. This scale of mapping can only be used to identify features hundreds of metres across and should only be used for national, or regional-scale environmental planning, rather than precise local or field-specific decisions.	assessment (noting the limitations of the memoir discussed at ref. 3.36 above). The Applicant considers that the field survey takes precedence over the published data. Variability between the field survey and historical data is explicable by changes to the effectiveness of under-drainage. Impaired soil drainage was recognised at both the reported field survey presented within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] and the early separate reconnaissance scale survey of the Solar Development Area undertaken by LRA[1].
3.41		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 4.6.4. New text: Updated Predictive DEFRA mapping indicates that the site is a mix of ALC Grade 1, 2, 3a and 5. Comment: The map does not show any Grade 5 land within the development boundary. It	Grade 5 land from the Predictive DEFRA mapping encroaching into the Order Limits can be seen in brown from the snapshot below (Grade 5 in shown in brown). Reference to the very small area of Grade 5 land from Predictive DEFRA mapping as background information does not alter the establishment of baseline within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] and the

[1] LRA (2024) Meridian Solar Farm. PEIR Volume III Appendix 9-1: Agricultural Land Classification Survey Report – PV Area. Available at: https://meridiansolarfarm.co.uk/wpcontent/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 15/10/2026]

Reference	Topic	Summary of Matters Raised	Applicant's Response
		shows only Grades 1, 2 and 3a (all BMV) and a small area of non-agricultural land. This mapping is also at 1:250,000 and should only be used for strategic scale purposes.	assessment of effects within **ES Chapter 5: Agriculture and Soils** {REP1-014]. 
3.42		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 5.1.2 and 5.1.3. Intrusive Soil Findings: The text describes clay subsoils as slowly permeable by reference to an LRA survey without independent supporting evidence and associated photographs. The text also refers to root channels found in the 1991 MAFF survey not being found during the survey. A biopore content of less than 0.5% is described, again without reference to a suitable image. It is not	Soil from trenches was further excavated gently with hand tools and water spray bottles to remove soil from the face for logging. Logs within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] were updated for Deadline 1 to indicate where negative $CaCO_3$ results had been recorded.

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		possible to reliably identify fine root channels or biopores from auger borings, which generally destroy fine soil features in the core extraction process. How was this determined, certainly not from auger samples? Observations from the undisturbed faces of mechanically-excavated archaeology trenches would be similarly limited by smearing and desiccation evident in the available images. The auger logs [Appendix II of ES Appendix 5-3] show only five horizons as positive for $CaCO_3$ in column 5; whilst the absence of an entry implies that no testing was done, it is understood from the sub-contractor that undertook the survey that no entry reflects a negative test. The lighter type 1 soils described are mapped as mainly Wisbech and Agnew series in the in the Boston and Spalding Soil Memoir and classified as calcareous alluvial gley soils because of their calcitic foraminifera content. This represents a significant	The findings of the LRA survey[2] are discussed within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030]. Biopores were not recorded uniformly across every soil type or horizon in either the LRA survey or the subsequent detailed surveys. Within Parcel D of the LRA report, macropores were absent, or only very few fine pores were recorded, below approximately 30 and 40 cm (two observations provided). This is consistent with Parcel C, where less than 0.5% biopores were recorded in the subsoil between 30-100 cm. Parcel B observations are also variable, including less than 0.5% pores between 64 -100 cm. Parcel A is the only parcel in which pit observations recorded macropores throughout the soil profile. The low abundance of biopores recorded in Parcel A presents some inconsistency with the LRA evidence but each survey identifies slowly permeable subsoil conditions.

[2] LRA (2024) Meridian Solar Farm. PEIR Volume III Appendix 9-1: Agricultural Land Classification Survey Report – PV Area. Available at: https://meridiansolarfarm.co.uk/wpcontent/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 15/10/2026]

Reference	Topic	Summary of Matters Raised	Applicant's Response
		difference with soils described in soil survey supporting the ES as 'largely non calcareous'. In marine alluvial soils, such as these, the results of any ALC survey should include evidence of testing each horizon of every auger bore for $CaCO_3$. This significant departure from authoritative mapping should be supported by rigorously evidenced observations. The results of the LRA survey were informed by a number of soil pits which support the Boston and Spalding Soil Memoir. The LRA survey found macropores in clay soils ranging from 0.5% to 2%, and subsoil structures that were typically moderately developed angular blocky of prismatic, not the massive or platy structures arising from cultivation damage.	
3.43		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 5.2 and 5.3. Descriptions of Wetness Limitations in Soil Types 1 & 2: All the soils are mapped and classified as alluvial gley soils of varying subgroups and series', contradicting the recorded auger observations supporting the	The reported survey presented within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030], LRA survey, and the 1991 MAFF survey within the Solar Development Area, all reported a majority of non-calcareous soils. Additionally, data from the LandIS auger profile portal record a majority of auger samples having non-calcareous topsoils.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		ES, which describe every soil as 'ungleyed' in the 'Gley 'column. Calcareous clay soils of the Newchurch series are mapped as present in the area in the mapping accompanying the Boston and Spalding Soils Memoir. This series would be one ALC grade better than the non calc Wallasea, identified in the ES and also mapped in the area. The Site Survey Logs attached to the land classification report [App II of ES Appendix 5-3] include a column [5] for $CaCO_3$ showing all horizons bar five as blank, suggesting that there was a negative text for calcareousness. This is in conflict with evidence that informed the Boston and Spalding Soil Memoir, which clearly shows the calcareous Wisbech and Agnew series' in close association with the clayey Wallasea series in the area. The latter series is described in the Memoir as containing calcareous Newchurch soils, which appear to be absent from the Meridian survey.	As stated above, the field survey is considerably more detailed than any available published material, including the 1:50,000 scale mapping contained within the memoir. The Applicant considers that the field survey takes precedence over the memoir; they are a denser resolution of samples and more recent.
3.44		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 5.3.1. The Wetness Class assigned to Soil Type 2 conflicts with the findings of work carried out	Historic piezometer records collected during MAFF research programmes can provide useful evidence of groundwater conditions when monitoring was undertaken (i.e. c.50 years ago). However, such data should not automatically be assumed to

Reference	Topic	Summary of Matters Raised	Applicant's Response
		by MAFF and the Soil Survey of England and Wales (SSEW), which puts the Wallasea series in Lincolnshire in WC II. This work was based on an intensive deployment of piezometers by the MAFF Field Drainage Experimental Unit and dip wells by the SSEW throughout the area. Drained Wallasea series were found to be in WC II and occasionally in WC I. It is extremely unlikely that an auger survey carried out in a very dry summer, when the soils are described as too dry for pit digging, could gather sufficient evidence to contradict this conclusion (see 3.3.3) and the conclusions drawn are therefore unreliable.	represent current groundwater conditions without supporting evidence. Changes in the effectiveness of land drainage are particularly relevant. Groundwater conditions may be also affected by climate change, water pumping regimes, water management practices, and land use/agricultural practices. Over a decades-long period alteration to groundwater levels and seasonal water-table behaviour is anticipated. As noted within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030], in addition to the detailed ALC surveys completed for the Site, wetness limitations were also recorded by the LRA survey. As such, two separate Site-specific surveys undertaken by separate surveyors at different times have come to the same conclusion.
3.45		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 5.3.3. Text: A total of 157.83ha has been identified with the combination the topsoil texture (Medium Silty Clay Loam), Wetness class (III) and the number of Field Capacity Days (93.00) which results in ALC Grade 3a for Type 2 Soils. However, it is noted that these sections of the	The 157.83 ha does not comprise a single, contiguous area of Grade 3a land; it is distributed across a number of locations, including isolated individual observations within fields otherwise predominantly classified as Grade 3b. The ALC grade at each observation point was determined from the physical characteristics of the soil, including texture, wetness class and climatic limitation, and not from land use or management.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		site are not managed differently to the wider site area and where there are no visual difference between these areas and the lower graded adjacent land it is justifiable to group these areas of Grade 3a into the surrounding Grade 3b land. To avoid isolated mapping unit impurities. This adjustment of the grading of land appears to be based on the management of the land, not the location of the site and the physical characteristics of its soils. Defra guidance on agricultural land classification does not include any provision for grading land according to land use or management. This downgrading of 157ha of BMV land to non BMV affects some 26% of the total area of Parcels B&C and does not meet the requirements of established guidance on land classification.	Land management was considered only as supporting contextual evidence when defining the boundaries of mapped units. In accordance with standard ALC mapping practice, isolated Grade 3a observations that were insufficient in extent to form coherent, mappable units were incorporated into the surrounding Grade 3b mapping unit to avoid unrepresentative mapping-unit impurities.
3.46		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, para 6.2.1. This conclusion repeats the error described above, that land should be classified in line with its management, not the physical characteristics of its soils and its location. This	This matter is addressed in the response at ref. 3.45 above.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		conclusion is based on findings that have no basis in the classification of agricultural land.	
3.47		ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C, Soil pit logs. The Soil Pit Logs appended to the report [pp68 & 69 of App3 to ES Appendix 5-3 EN010169-000604] pit contain nothing new. The limitations imposed by standards to which the Pits were excavated fail to meet the published guidance and no images have been provided to support the conclusions drawn. Several images of auger samples showing clear evidence of ochreous colours and mottling [9, 10, 12, 14 & 15] but there is no indication of the locations where the samples were taken or conclusion drawn regarding permeability. Photograph 15 is of a mottled clay subsoil that appears to be very well structured.	The provision of photographs is not a requirement of the published ALC survey methodology, and the absence of photographs does not invalidate the recorded field observations. The limitations on excavation depth arising from the exceptionally dry and hardened clay soils are explained within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030]. Although the pits could not be excavated to the full intended depth, they exposed sufficient subsoil for examination because the subsoil horizons occur at depths shallower than 100cm. The pit logs therefore provide relevant supporting evidence of the observed subsoil characteristics, including texture, structure, mottling and permeability indicators. No conclusions are drawn on structure from auger samples as this is not common practice.
3.48	ES Appendix 5-2: Agricultural Land Classification	ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 3.3.4 Comment: Whilst additional samples have been collected from across areas unsurveyed	This matter is addressed in the response at ref. 3.47 above.

Reference	Topic	Summary of Matters Raised	Applicant's Response
	Report - Parcels A and D	at the time of the original surveys, no additional, adequate, soil pits have been dug in order to verify the findings of the soil survey and the observations made from the archaeological trenches.	
3.49		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 3.5.1 Original Text: During the analysis stage, the ALC grade has been calculated on a point-by-point basis, with features of wetness class (Slowly Permeable Layer and Gleying) analysed from each auger sample. To support the field assessment, laboratory analysis of selected topsoil samples has been undertaken. These provide confirmation of physical characteristics of the soils and have been used alongside field observations to inform the final ALC grading. Selected topsoil samples cannot be used to inform the physical characteristics of underlying subsoil, which have been used as the basis for downgrading land. The evidence adduced does not confirm or repudiate the	This matter is also addressed in the response at ref. 3.39 above. The grade according to wetness of soils is calculated using Table 6 of the MAFF Guidance. The information required for this is the Field Capacity Days, Wetness Class and texture of the top 25cm of soil. Laboratory analysis was undertaken to confirm distinction between clay-loam and clay topsoils, as this distinction in texture can result in a lower grade. The Applicant has not claimed that the information informs the subsoil. The textural analysis of the topsoil is the determining issue for downgrading land based on the wetness criterion.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		claimed almost universal presence of slowly permeable subsoils in the Type 2 soil.	
3.50		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D As with the report describing Areas B & C, this review does not acknowledge the existence of detailed guidance on the soils of the area set out in the Boston and Spalding Soil Memoir and accompanying mapping.	This matter is addressed in response at ref. 3.40 above.
3.51		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 5.1.2 and 5.1.3. The description of clay subsoils as slowly permeable in the report relies on reference to the LRA survey. The report differs significantly from the LRA survey in that it failed to identify and root channels or biopores in the observed soil samples; biopores were observed at <0.5%. It is not clear whether this quantification refers to the existence of biopores at <0.5% or whether biopores were not present in the samples. It is very unlikely that biopores would have been identifiable in low dry matter samples taken off an auger that would have caused extensive displacement of	The structures identified during the survey were of coarse subangular blocky and coarse prismatic structures. The Applicant has not reported platy or massive structures, and neither structure forms part of the survey conclusions within the stated paragraphs. The findings of coarse subangular blocky and coarse prismatic structures are consistent with the LRA survey. The absence of photographs documenting each detailed field procedure does not indicate that those procedures were omitted. Photographs are not a requirement of the ALC methodology, and it is not practical to take and present photographs of every individual field operation, and the conclusions are based on the recorded field observations rather than photographic coverage.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		soil microstructures when being extracted. Furthermore, there is no photographic evidence of these structures, specifically because the faces of the archaeology trenches had not been picked to examine structure and pores. By contrast, the LRA survey included a number of soil pits which found macropores in clay soils in the range from 0.5% to 2%, with typically moderately developed angular blocky or prismatic subsoil structures, not the massive or platy structures arising from cultivation damage observed during the survey that informs the ES.	Biopores were not recorded uniformly across every soil type or horizon in either survey. Within Parcel D of the LRA report, macropores were absent, or only very few fine pores were recorded, below approximately 30 and 40 cm (two observations provided). This is consistent with Parcel C, where less than 0.5% biopores were recorded in the subsoil between 30-100 cm. Parcel B observations are also variable, including less than 0.5% pores between 64 -100 cm. Parcel A is the only parcel in which pit observations recorded macropores throughout the soil profile. The low abundance of biopores recorded in Parcel A presents some inconsistency with the LRA evidence but each survey identifies slowly permeable subsoil conditions.
3.52		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 5.2 and 5.3. The soils of the area are described in the Soils Memoir for Boston and Spalding and associated mapping as alluvial gley soils of varying subgroups and series where the Site Survey Logs record every soil as ungleyed in the gley column. These observations conflict with the characteristic gley features seen in	It is accepted that many of the subsoils may appear pale or greyish in the photographs. However, soil colour was assessed in the field against a Munsell Soil Colour Chart under real life viewing conditions, rather than retrospectively from photographs, whose colour reproduction is influenced by lighting, exposure, white balance, moisture condition and display settings on the screen which they are viewed.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Photographs 7, 8, 9, 10 & 12 and Pit Logs 4, 5 and 6. The mapping accompanying the Soils Memoir for Boston and Spalding also identifies in the area calcareous clay soils of the Newchurch series. This soil type should be classified a grade better than the non-calcareous soils of the Wallasea series. A large number silty clay soil profiles, e.g. A16 to A59, are reported in Column 5 of the auger logs as having "positive effervescence" indicating CaCO3, i.e. calcareous, but are classified as Grade 3b. Even if these soils are in Wetness Class III, which is unproven, CaCO3 content would bring them into Grade 3a; these soils are wrongly classified as Grade 3b, that is non-BMV.	A substantial proportion of the recorded matrix colours were borderline, including 10YR 5/4 and 10YR(or 7.5YR) 3/2. Although these colours may appear visually pale or greyish, they do not fall within the colour parameters used by the MAFF guidance to define a gleyed horizon. The soils were therefore recorded as ungleyed where the observed Munsell colour did not meet gleyed criteria. Their broader mapping does not override the horizon-specific field assessment undertaken at each observation point. 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 **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030] and Section 5.6 of **ES Chapter 5: Agriculture and Soils** [REP1-014], which note 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.

Reference	Topic	Summary of Matters Raised	Applicant's Response
3.53		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 5.3.1. The attribution of Wetness Class III to Soil Type 1, Wallasea soils undermines all previous work which puts such soils Wallasea in Lincolnshire in WC II. This attribute is based on an intensive deployment of piezometers by the MAFF Field Drainage Experimental Unit and dip wells by the SSEW. Drained Wallasea series were in WC II and occasionally in WC I. An auger survey in a dry summer (when the soils are described as too dry for pit digging could not gather sufficient evidence to contradict this (see 3.3.3).	This matter is addressed in the response at ref. 3.44 above.
3.54		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, para 6.2.1. This conclusion repeats the error described in the commentary on Parcels B & C, that land should be classified in line with its management, not the physical characteristics of its soils and its location. This conclusion is based on findings that have no basis in the classification of agricultural land.	As set out in response to ref. 3.45 above, the ALC grade at each observation point was determined from the physical characteristics of the soil, including texture, wetness class and climatic limitation, and not from land use or management. Land management was considered only as supporting contextual evidence when defining the boundaries of mapped units. In accordance with standard ALC mapping practice, isolated Subgrade 3a observations that were insufficient in extent to

Reference	Topic	Summary of Matters Raised	Applicant's Response
			form coherent, mappable units were incorporated into the surrounding Subgrade 3b mapping unit.
3.55		ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D, Pit logs. More images of archaeology trenches have been added, with two repeated images and one missing from the series (Pit Log 5). Pit Log 4 records a Slowly Permeable Layer at 35cm, a feature that is not evident from the image since the majority of the exposed face is smeared. Pit Log 6 records gleying to the base of the 0.79m deep pit and a Slowly Permeable Layer at 0.36m. Despite visible features characteristic of gleyed soils, the profile is described as not being gleyed. There is no visible evidence of a Slowly Permeable Layer. Images of hand-held samples (7-12) are not located either spatially or for depth and descriptions go beyond what is visible in the images, with no laboratory verification of soil texture. Photo 8 is of a Clay subsoil clod recovered from trial pit. It is not clear if this is from an	The Applicant accepts that the smearing of the exposed face limits what can be seen in the photograph. The Slowly Permeable Layer was identified in the field. These observations were made on a freshly prepared face and on extracted peds using hand tools and water, rather than from the trench wall as photographed. For images of samples presented within **ES Appendices 5-2 and 5-3** [REP1-028 and REP1-030], the photographs are intended to illustrate the samples rather than to show every characteristic described, as features such as texture and consistence are assessed by handling rather than visually. Additionally, it is not necessary to lab test the samples which have been photographed specifically, and a selection of topsoil samples across the Site have been tested as part of the assessment.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		archaeological trench or some other pit, or at what depth it was taken.	
3.56	Outline Soil Management Plan.	Outline Soil Management Plan. This document has undergone negligible change and previous comments stand.	The Applicant's responses to RAC's comments on the **OSMP** (Doc Ref. 7.14 Rev 2) are provided within Table 3-18 of **Applicant's Comments on Local Impact Reports** [REP2-015].
3.57	Post ISH1 Note: Best and Most Versatile (BMV) Land Take	Post ISH1 Note: Best and Most Versatile (BMV) Land Take The application of the precautionary approach to the restoration of BMV land used for hard standing occupied by the On Site Substation, and BESS Compounds, solar stations and CSEC compounds is welcome. This approach acknowledges that it may not be possible to achieve original land quality soon after the decommissioning phase. The assumption of a down grading of land on a permanent basis is reasonable but it is noted that this is not relied upon to propose no restoration of the land. Whilst the Applicant states that restoration is secured for all areas, it would be reasonable to require that best efforts during restoration to achieve the original BMV grade are made during restoration and that plans for	The Applicant has accepted that the restoration of BMV land (not only Grades 1 and 2) within the timeframe of the decommissioning phase may be challenging and the effects have been presented 'as if' permanent, including on Subgrade 3a. However, the Applicant is pleased that the commitment to the restoration of all land to the original grade within the **OSMP** (Doc Ref. 7.14 Rev 2) has been recognised. The Applicant has committed to restoring land to its original grade and provided additional detail within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099]. The summary document outlines approaches to cultivations of the subsoil and re-establishment of biological activity, before reinstatement of the stored topsoil. Indeed, it is the length of time required for the (non-harvested) cover crop, for the purpose of

Reference	Topic	Summary of Matters Raised	Applicant's Response
		restoration are open to consultation with the relevant prevailing Authorities.	introducing biological cycling, that is the step that extends the restoration period. The detailed Soil Management Plan, to be prepared in substantial accordance with the **OSMP** (Doc Ref. 7.14 Rev 2), will set out further details and will be subject to approval by LCC in accordance with Requirement 19 of the **Draft DCO** (Doc Ref. 3.1 Rev 3).

2.4. Meridian Action Group

2.4.1. The following subsections provide responses to the matters raised by Meridian Action Group (MAG) at Deadline 2.

LCC and SHDC Local Impact Reports

2.4.2. The Applicant notes MAG's submissions commenting on the matters raised within LCC's and SHDC's LIRs submitted at Deadline 1 [REP2-029 and REP2-030]. The Applicant responded to the matters raised in the LIRs within the **Applicant's Comments on Local Impact Reports** [REP2-015] submitted at Deadline 2.

Outline Skills, Supply Chain and Employment Plan

2.4.3. The Applicant's response to MAG's submission [REP2-027] on the **Outline Skills, Supply Chain and Employment Plan** (OSSCEP) (Doc Ref. 7.17 Rev 2) for the Scheme is set out below.

Reference	Topic	Matters Raised	Applicant's Response
1.0	Study Area	MAG believe that there are significant flaws in Meridian's skills, supply chain and employment plan. The study area has been set as a 60-minute drive time from the scheme. This includes an area way beyond the boundaries of South Holland. Within the 60-minute drive time area are Peterborough, Huntingdon, Corby, Kettering, Cambridge, Lincoln and King's Lynn. This overarching parameter brings into disrepute all the claims that follow for benefits to the local area.	The Applicant notes MAG's comments on the study area used for the assessment of employment and economic benefits. The 60-minute drive time study area reflects a standard methodology used for impact assessments of solar NSIPs and other infrastructure Schemes. As explained in **ES Chapter 14: Socio-Economics and Land Use** [APP-065] and the **OSSCEP** (Doc Ref. 7.17 Rev 2), the study areas reflects research by the Chartered Institute of Personnel and Development finding that 90% of UK employees commute 60 minutes or less each way. It represents the Scheme's principal labour market catchment area, being the geography within which people might reasonably be expected

Reference	Topic	Matters Raised	Applicant's Response
			to live and commute to take up jobs created by the Scheme, and the area relevant to assessing demand for temporary worker accommodation during construction. The Applicant selected this geography because it is the standard, recognised approach for this type of assessment, and not as MAG suggests because of the result it would produce. The Applicant does not agree that the use of this study area "brings into disrepute" the benefits claimed. The assessment is explicit, throughout, about the proportion of benefits expected to accrue within and outside the 60-minute drive time study area, rather than presenting only an aggregated figure.
2.0	Local benefits	What would be more pertinent would be a study area within the bounds of South Holland if we are to be convinced about the economic benefits to areas more local to the scheme. The 60-minute drive time study area means much of the economic benefits felt by the 855 FTE staff per day will be taken out of the scheme locality and the South Holland area. In fact the picture worsens when Meridian concedes that 60 per cent of staff would reside outside the study area. Conversely Meridian can and does give figures for South	South Holland-specific data has been presented as part of the baseline. Both **ES Chapter 14: Socio-Economics and Land Use** [APP-065] and the **OSSCEP** (Doc Ref. 7.17 Rev 2) describe the baseline for the Principal Economic Impact Area (the 60-minute study area) and then provide, "where relevant", equivalent figures for South Holland, Lincolnshire, the East Midlands and England as comparator geographies. The aim is to provide a comprehensive understanding of the characteristics and context of the local area to inform the assessment of effects and the proposed

Reference	Topic	Matters Raised	Applicant's Response
		Holland alone - making the point that the site is within the South Holland District Council administrative boundary, and giving figures for South Holland's economic activity rate, level 4 degree qualification and levels of deprivation. It seems as though the wider travel-to-work area has been deliberately chosen to inflate the employment benefits. There is no accurate estimation of new employment for the immediate area, even though other figures have been boiled down to be applicable to only South Holland; so it can be done. In this latest version of the Plan, Under the headings of "opportunities" many "could, likelies, considers" have belatedly been changed to "will". Opportunity 3 STEM education and careers must be changed to say this WILL target named schools and colleges in South Holland.	skills, training and supply chain initiatives. This approach to baselining does not undermine the use of the 60-minute study area to underpin the analysis of employment or GVA benefits, or accommodation impacts. The Applicant has further amended the **OSSCEP** (Doc Ref. 7.17 Rev 2) at Deadline 3, as suggested, changing the wording regarding Opportunity 3 STEM Education targeting the named schools and colleges from 'would' to 'will'.
3.0	Community Benefit Fund	Reference to using a community benefit fund for education and skills remains so woolly as to be worthless. In any event the Community fund is not covered by the DOC so is not binding	The Applicant provided a detailed explanation of its approach to the proposed Community Benefit Fund including why it is not appropriate to secure the Fund within the DCO at Deadline 1 in **Post ISH1 Note: Community Benefit Fund** [REP1-100]. As set out within the **Applicant's Comments on Local Impact Reports** [REP2-015], Table 3-10, ref.

Reference	Topic	Matters Raised	Applicant's Response
			10.10, the Applicant will continue engagement with the local authorities through the Community Benefit Fund on where any strategic funds can be directed subject to the receipt of more detail on the funding request to ensure that it aligns with the aims of the Community Benefit Fund to deliver direct benefits to the local community affected.
4.0	Local employment	4.0 Meridian "will investigate" measures to promote take up of jobs by local people. This sentence needs to drop the word "investigate" and must define "local" - is this the 60- minute drive time study area (so not really local) or just South Holland? The same applies to "local businesses" and "local partners" under opportunity 6; define local Meridian persists in its updated document that not one single FTE job is currently associated with 1,067ha of what they themselves term "predominantly agricultural land". This assumption is ridiculous. A quick search reveals trusted Government figures for FTEs associated with this volume of farmland and the additional FTEs generated down the line by those employed to process the grown produce. Four to ten FTE directly, 400 to 675 FTE for potatoes, carrots, onions,	On the commitment to "investigate" measures to promote take-up of local jobs (Opportunity 4, set out within the Executive Summary at paragraph 4.5.2 of the **OSSCEP** (Doc Ref. 7.17 Rev 2), the Applicant considers that the wording remains appropriate. A firmer commitment or a description of more specific measures would at this stage be premature. Further detail will be included within the full skills, supply chain and employment plan (which as per Requirement 20 of the **draft DCO** (Doc Ref. 3.1 Rev 3) will be substantially in accordance with the **OSSCEP** (Doc Ref. 7.17 Rev 2) and will be approved by the relevant planning authority) once the necessary discussions with contractors and Local Authorities on local recruitment have been undertaken. As noted at paragraph 4.5.2 and 4.5.3 of the **OSSCEP** (Doc Ref. 7.17 Rev 2), while supporting the principle of local

Reference	Topic	Matters Raised	Applicant's Response
		brassicas - Department for Environment, Food and Rural Affairs GOV.UK Standard Labour Requirements). Gross value added to the 60-minute travel area is set at £8.9 million per annum, but there is no break down to illustrate how much would be added to the South Holland area or, even more pertinent, the scheme impact area. However, Lincolnshire County Council, says taking the land out of agricultural production will cost the local economy £80 million over the 40 years, and the negative impact on the local economy will be £57 million to £76 million. Para. 2.2.13: "a gross number of 10 permanent jobs generated by the scheme; 2.2.14: "there are no workers who are reliant on the farmland for full time employment". These are carefully chosen words to give the impression that, so far as taking the land out of agricultural production, there is no negative impact on employment. This abandons the previous adherence to FTE. This false interpretation serves to inflate the claimed positive impact for future employment. The claim that gross ten permanent jobs and a net gain of 11 is nonsensical. Surely the logic here points to the current employment for managing more than a	staffing in order to generate benefits for the local community, the Applicant also recognises the need to hire staff with the required skills to deliver the Scheme, especially given the technical complexity of some elements of the Scheme. To identify the most effective means to promote the take-up of jobs by local people and to tap into existing local employment support networks, the starting point will be engagement with Local Authorities and this engagement would take place post consent, during development of the full SSCEP. On the definition of 'local' in the context of Opportunity 4 Local Recruitment and Opportunity 6 Business Support and Procurement Strategy, South Holland will be the primary target area for the purposes of these commitments. The beneficiaries most appropriately targeted under each initiative will be further discussed and agreed with the local authorities during development of the full SSCEP, and relevant detail provided within that document. On the Department for Environment, Food and Rural Affairs (DEFRA) Standard Labour Requirement figures, the assumption that no full-time equivalent direct agricultural jobs would be lost due to the change in land use is based on the

Reference	Topic	Matters Raised	Applicant's Response
		thousand hectares of farmland at minus one! Can we have clear clarification about where business rates collected for this scheme go - the annual amount to be paid and whether all or some of it is retained and used locally and if so, how much?	Applicant's understanding of existing activities and its discussions with the landowners in question, rather than the application of theoretical benchmarks such as this Standard Labour Requirements dataset. The Applicant does not consider it clear how the wider indirect employment figures put forward using the DEFRA dataset have been derived, and maintains that an approach grounded in the actual circumstances of the landholdings in question, rather than generic national averages, is the more robust and proportionate basis for this assessment. In relation to the £8.9 million per annum Gross Value Added figure contained with Table 14-21 of **ES Chapter 14: Socio-Economics and Land Use** [APP-065], MAG are correct in noting that this figure refers to estimated benefits within the 60-minute study area. As noted above, this is because a 60-minute drive time is assumed to be a reasonable commuting distance for workers and therefore taken as the principal economic impact area when considering economic effects. Presenting a GVA figure for South Holland, or otherwise disaggregating GVA impacts to a smaller geographical impact area, would require further analysis of commuter flows and would reflect a

Reference	Topic	Matters Raised	Applicant's Response
			less realistic picture of the labour market relevant to the Scheme. The Applicant therefore considers the level of reporting to be the most appropriate basis for this assessment, and the approach to be proportionate. On the reference to an £80 million cost to the local economy, the Applicant understands this to relate to the figures in Lincolnshire County Council's Local Impact Report [REP1-106], which estimates the potential gross agricultural output achievable from the 1,064 hectares within the Solar Development Area at between £57.24 million and £76.16 million over the Scheme's 40 year operational period, and treats this as a value lost to the local economy. The Applicant does not consider this a robust representation of the net economic effect of the Scheme. The estimate is derived from the gross value of agricultural output the land could achieve, which is not in itself a measure of net economic effect: gross output does not account for the costs of production, including fuel, fertiliser, seed and machinery, a substantial proportion of which is spent outside the local area, nor does it reflect that a significant proportion of produce grown on land of this kind is transported outside Lincolnshire to retailers and wholesalers

Reference	Topic	Matters Raised	Applicant's Response
			based elsewhere in the country. **ES Chapter 14: Socio-Economics and Land Use** [APP-065] instead considers economic effects in terms of net employment, which the Applicant considers to be a more robust and proportionate approach. On the statement "there are no workers who are reliant on the farmland for full time employment", this wording within **ES Chapter 14: Socio-Economics and Land Use** [APP-065] has been used to convey how existing agricultural employment has been taken into account within the assessment of net employment effects, which refers to full-time equivalent (FTE) jobs throughout. This statement reflects the Applicant's assessment that no individual's full-time employment is wholly dependent on this particular landholding remaining in agricultural use, which is the basis on which no FTE job losses have been attributed to the change in land use. On business rates, the Applicant confirms that the Scheme will be liable for non-domestic rates, which will be paid to the relevant billing authority in the normal way, with a proportion retained locally under the business rates retention arrangements that apply to local authorities in England. The Applicant has not yet finalised the

Reference	Topic	Matters Raised	Applicant's Response
			projected annual rateable value or rates liability for the Scheme, and a precise figure has not been confirmed at this stage.

Impact on Water Use and Supply

2.4.4. The Applicant's response to MAG's submission on water demand and supply for the Scheme [REP2-027] is set out below. The Applicant submitted a **Water Supply Strategy** [REP2-015] at Deadline 2 to provide clarification on quantities of water likely to be required during construction and operational phases of the Scheme and to consider potential supply options. The current proposal is for construction water to be supplied by commercial tanker deliveries from licensed sources. The assessment concludes this is a practical and achievable approach. However, reflecting the recent consultation, a Water Resource Assessment request has been submitted to Anglian Water Services. It may also be possible for some compound locations to connect directly to the mains supply, and this is also to be considered in consultation with Anglian Water Services. Alternative options include obtaining water through abstraction licence trading, and as the Environment Agency have suggested, a de minimis abstraction on site. However, at this stage direct abstraction from local watercourses or a new groundwater borehole is not favoured due to uncertainty over water availability, implementation costs and practicality. The Scheme is also committed to investigating options to minimise water demand and reuse and recycle water where possible (e.g. rainwater harvesting). The **OCEMP** (Doc Ref. 7.10 Rev 3) and the **OOEMP** (Doc Ref. 7.11 Rev 2) were updated at Deadline 2 to this effect. However, these measures are not considered capable of meeting the Scheme's water requirements on their own and would supplement, rather than replace, the main water supply source.

2.4.5. The decommissioning phase has been excluded from the **Water Supply Strategy** [REP2-015], on the basis that the water demand during decommissioning would not exceed that set out for construction and the same overall strategy for supply would be adopted. The **ODEMP** (Doc Ref. 7.12 Rev 2) has been updated at Deadline 3 to include a commitment to prepare and agree with appropriate stakeholders a suitable Water Supply Strategy prior to decommissioning works being undertaken.

2.4.6. The Applicant is continuing to engage on these matters with Anglian Water Services and the Environment Agency, as recorded in the respective SoCGs with these parties.

Community Benefit Fund Offer

2.4.7. The Applicant's response to MAG's submission [REP2-032] on the Community Benefit Fund is set out below.

Reference	Topic	Summary of Matters Raised	Applicant's Response
1.0	Level of Community Benefit	We should consider the Government's emerging guidance and benchmarks, alongside the level of community benefit already being provided by another renewable energy development within our community	The proposed Community Benefit Fund (CBF) is subject to final investment decisions, based on detailed design and project commitments made through the development lifecycle of the project. The Applicant is committed to delivering a CBF as it does on many other schemes, and the draft values proposed are consistent with those offered elsewhere. The Applicant will continue to monitor industry and government guidance as it emerges on CBF.
2.0	Payments Should Not Depend on Electricity Output	The CBF should be based on the installed generating capacity of the development, rather than being linked to the amount of electricity actually generated.	Payments are not linked to the electrical output of the Scheme. Given the nature of solar, the amount would fluctuate between seasons, and thus the Applicant considers it more appropriate to link the payments to the agreed export capacity to the National Grid of 750MW.
3.0	Community Benefit Should Begin Before Commissioning	It is also unfair for community benefit payments to begin only once the development has been commissioned.	The Applicant can confirm that payments will commence upon the start of construction, with the level of payment to each parish council tailored to reflect the impact on communities during the

Reference	Topic	Summary of Matters Raised	Applicant's Response
		The disruption to the community does not begin on the day electricity generation starts. It begins during the preparatory and construction phases, when the impact on local residents and communities may be at its greatest.	construction phase and then the operational phase.
4.0	Certainty and Consistency	Across the relevant parishes and communities in proximity to the Scheme, payments should be made on a consistent annual basis.	As highlighted in **Post ISH1 Note: Community Benefit Fund** [REP1-100], it is the aim of the CBF to deliver annual payments to three different streams. The exact detail is to be confirmed however with each individual organisation, as some have already highlighted through discussions that a different mechanism (such as initial upfront payment) may be preferred. The Applicant is committed to working with all organisations to identify the best way forward for each.
5.0	Capital Projects	One-off capital projects could be supported from the CBF where they are specifically agreed with the relevant community. However, such projects should be funded from a clearly defined proportion of the CBF. Applications for capital funding should not reduce the overall value of the annual community benefit available to communities.	The third party administered CBF will be available to all residents/businesses/local groups within a defined area, to apply to an independent board for capital projects. This fund exists so that all have potential access to funding, and not reliant on parish council or local authority contacts.

Reference	Topic	Summary of Matters Raised	Applicant's Response
6.0	The CBF Should Be Clearly Defined	The fact that other solar developments may have proceeded without a CBF being attached to their Development Consent Order (DCO) does not mean that a clear CBF cannot be established for this Scheme. Leaving the CBF arrangements broadly defined gives too much scope for uncertainty and future disagreement.	The CBF is as defined as it can be prior to consent, detailed design, and connection agreed with NESO. Those organisations identified in the running, management, and distribution of potential funds have been, and continue to be, engaged with, namely the relevant parish councils, potential third party community fund managers, and the local authorities. Although the CBF is not secured by a planning agreement, the Applicant remains committed to delivering the CBF should the Scheme be granted consent. The Applicant notes that this approach, whereby the CBF is not secured via a planning agreement, has been adopted on numerous other Development Consent Orders granted by the Secretary of State including the Cottam Solar Project Order 2024, the Tillbridge Solar Order 2025 and Springwell Solar Order 2026 amongst others.
7.0	The Fund Must Provide Additional Community Benefit	The CBF must provide genuine additional benefit to the communities affected by the development. It should not be used to remedy damage caused by construction, nor should it be used to fund services or projects that are already the responsibility of the local authority	The Applicant can confirm that the CBF is to be used for additional community benefit, outside of the commitments made in other application documents such as the Environment Statement and Commitments Register, where those items are mitigation for the Scheme or are relevant to the planning assessment of the Scheme. The key

Reference	Topic	Summary of Matters Raised	Applicant's Response
		or otherwise already accounted for through existing public funding.	purpose of the CBF is to derive significant additional benefit from the Scheme should it go ahead.

Connection to National Grid

2.4.8. The submission made by MAG in relation to the connection of the National Grid [REP2-031] predominately summarises the status of discussions between the Applicant and NGET. The Applicant has set out its position within its **Written Summary of Oral Submissions at ISH1** [REP1-098] and at Section 2.22 of the **Applicant's Response to Written Representations** [REP2-014] which provides further commentary in respect of the points raised by MAG.

2.5. Natural England

2.5.1. The following table provides a response to any new or unresolved matters from Natural England's Deadline 2 comments [REP2-025].

Table 2-4 Responses to new queries raised in the Natural England Deadline 2 Submission

Reference	Topic	Summary of Matters Raised	Applicant's Response
NE5	Identification of Functionally Linked Land (FFL)	Natural England has reviewed the updated HRA, including the information provided within Appendix 3 regarding the identification of Functionally Linked Land (FLL). Whilst we acknowledge that the Applicant has provided additional justification for the identification of FLL, we do not agree that all of the areas screened out from further consideration should be discounted based on the information presented. The survey data set out within HRA Appendix 3 includes records of SPA/Ramsar qualifying species occurring in some areas in notably high numbers indicating that these locations are used by SPA/Ramsar birds and may therefore provide a functional role in supporting the designated site populations. Of particular note are the numbers of Whooper Swan, Lapwing and Golden Plover identified: Location 'A1 – c.195ha arable land (occasional surface flooding)' supported:	The Applicant acknowledges NE's commentary on the inclusion of additional areas of potential FLL in further assessment. The Applicant 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) accordingly at Deadline 3. This adopts a precautionary approach, as suggested and considered specifically the effects of impacts on additional areas included in consideration of FLL.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		- A peak of 76.59% of the Wash WeBS population of Whooper Swan, with the species using the area regularly in 2024/25. - A peak of 1.02% of the Wash WeBS population of Lapwing on one occasion. - 10.6% of the Wash SPA's overall waterfowl assemblage, with regular use in 24/25. Location 'B – c.400ha arable land' supported: - A peak of 15.32% of the Wash WeBS population of Whooper Swan, with the species using the area intermittently in 2024/25. Location 'C – 219ha arable land' supported: - A peak of 1.75% of the Wash WeBS population of Whooper Swan, though only recorded on 2 occasions. Location 'D – c.280ha arable land' supported: - A peak of 2.03% of the Wash WeBS population of Lapwing, which were recorded a total of 15 times. - A peak of 54.70% of the Wash WeBS population of Whooper Swan, with the species recorded here on 6 occasions.	

Reference	Topic	Summary of Matters Raised	Applicant's Response
		'Land between Austendyke Road and West Gate' supported: - A peak of 2.27% of the Wash Ramsar population of Golden Plover, with the species recorded here on 5 occasions. 'Land north of A151' supported: - A peak of 1.02% of the Wash WeBS population of Lapwing, with the species recorded here on 3 occasions in 2025. Natural England notes an apparent inconsistency between the conclusions reached for these areas and the precautionary approach described in paragraph 4.4.10 of the HRA. This paragraph recognises that the use of supporting habitats by wintering and migratory birds can vary considerably between years and seasons and that the absence of consistently high numbers does not necessarily indicate that land is not functionally linked. It is therefore unclear why the same precautionary approach has not been applied to those areas where substantial numbers of SPA birds have been recorded, particularly where bird activity appears comparable to, or in some cases	

Reference	Topic	Summary of Matters Raised	Applicant's Response
		greater than, that recorded within areas identified by the Applicant as FLL. Natural England's preference would be for the Applicant to adopt the precautionary approach set out in paragraph 4.4.10 and retain these areas within the FLL assessment. The potential effects of disturbance and habitat loss on birds using these areas should then be considered within the Appropriate Assessment, together with any necessary mitigation measures, as discussed under NE7. In particular, consideration should be given to whether disturbance of these areas could adversely affect the integrity of the relevant SPA/Ramsar populations through impacts on the wider network of supporting habitat. Alternatively, should the Applicant wish to maintain its conclusion that these areas (or some of these areas) are not FLL, further information should be provided. This should include a clearer spatial explanation of the location of identified FLL fields, the location of bird records in relation to the proposed works, and a more robust justification as to why the areas screened out are not considered to provide functional value to SPA/Ramsar	

Reference	Topic	Summary of Matters Raised	Applicant's Response
		populations. However, given the significant numbers of SPA birds recorded within some of these areas, Natural England advises that any such justification would need to be supported by compelling evidence.	
NE6	Direct Loss of FLL	Appendix 3 has considered a number of additional areas of potential FLL. However, insufficient information has been provided regarding the location of these areas in relation to the Order Limits. We therefore request that mapping is provided to clearly show the extent and location of all potential FLL considered within the assessment. Referring to our comments at NE5, this information is necessary to determine whether any newly identified areas of FLL fall within the Order Limits or could be otherwise subject to significant disturbance effects arising from the Proposed Development. Where areas of FLL are identified within the Order Limits, Natural England considers that the Habitats Regulations Assessment should be updated to assess the implications of the long-term or permanent loss of this habitat resource for SPA bird populations, considering any potential mitigation measures, and whether the loss of	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 been updated to include full consideration of additional areas screened in as to be treated as FLL, as set out response to NE5.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		these areas could adversely affect the integrity of the relevant SPA populations. This would need to include an update to the in-combination assessment.	
NE7	Noise and Visual Disturbance to FLL	Natural England welcomes the applicant's decision to take the potential effects of noise and visual disturbance on SPA/Ramsar qualifying bird species through to Appropriate Assessment. Given the potential for construction activities to affect birds using Functionally Linked Land (FLL), we consider this to be an appropriate and precautionary approach. Lighting Natural England also welcomes the inclusion of lighting mitigation measures within the Outline Construction Environmental Management Plan (oCEMP). Whilst these measures appear to have been developed primarily for bats, the proposed controls are also relevant to SPA/Ramsar bird species using FLL within and surrounding the Order Limits. In particular, Section 2.6 of the oCEMP sets out a number of lighting principles, including the use of lighting only where absolutely necessary. This	**Lighting** The suggestion of using night-vision technology is acknowledged, but the primary purpose of lighting during construction will be for the safety of staff. Providing night-vision for CCTV would not reduce the requirement for lighting for safety purposes. 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. **Avoidance** The generic application of a broad winter working avoidance period is a safe and precautionary approach and represents the periods when birds were recorded that could

Reference	Topic	Summary of Matters Raised	Applicant's Response
		commitment is welcomed. However, Natural England recommends that security cameras operate using night-vision technology wherever possible to avoid the need for sudden or bright artificial illumination. Such an approach would help reduce the risk of disturbance and disorientation of birds migrating or commuting through the area at night, particularly during periods of poor visibility such as fog. It would also provide benefits for invertebrate populations, which can be adversely affected by artificial lighting through disruption to behaviour and life-cycle processes. Avoidance With regard to the proposed seasonal avoidance measures, it is not clear whether the generic winter period identified for avoidance reflects the survey data collected within the FLL areas. Information should be provided on the timing of peak bird usage of the relevant FLL parcels and whether this supports the proposed seasonal restriction period. It is noted that reliance on seasonal avoidance alone may not be sufficient to ensure disturbance effects	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 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 700m-1100m zone is considered to be a low risk of significant disturbance, so the measures proposed are precautionary and these distances are based on worst-case scenario noise levels. It is therefore considered that it should not be necessary at this stage to commit to specific low-noise approaches in these circumstances, but reasonable measures will be considered at detailed design. **Additional Mitigation** The Applicant is in agreement that the role of the ECoW should, in the first instance, be to

Reference	Topic	Summary of Matters Raised	Applicant's Response
		are avoided, particularly where construction programme constraints limit flexibility. Natural England notes the applicant's assessment identifying a disturbance distance of up to 1,100 m for piling activities. In our view, alternative piling methodologies (for example Auger piling) should be the default approach wherever works are proposed within this distance of identified FLL. Additional Mitigation Where works cannot be scheduled to avoid sensitive periods for SPA/Ramsar birds in proximity to FLL, Natural England welcomes the applicant's commitment to additional mitigation measures. However, we have concerns regarding both the effectiveness and practical implementation of some of the proposed measures. In particular, reliance on an Ecological Clerk of Works (ECoW) to identify bird disturbance during construction activities may not adequately prevent disturbance effects. Once disturbance has occurred, the impact has already taken place. The role of the ECoW should therefore be focused on preventing works from commencing until the relevant area has been checked and an	identify if relevant birds are present and at what distance. If they are within 700m, the works should be delayed until additional measures are in place or the birds have naturally moved away. 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. Taking account of this mitigation, in the worst case scenario where birds are significantly disturbed by the first event before the ECoW can halt works, it is highly unlikely that such a single noise event would have a significant negative effect on the ongoing usage of the location or on the health or survival rate of birds affected. It is considered that the proposed mitigation measures will be sufficiently robust to prevent significant effects as a result of disturbance on

Reference	Topic	Summary of Matters Raised	Applicant's Response
		appropriate clearance has been given. Nonetheless, this ECoW approach may cause significant programme delays should birds remain present for multiple days or over an extended period. We also have concerns regarding the feasibility of reducing construction noise to below disruptive levels through measures such as acoustic fencing. The noise contour modelling presented in HRA Appendix 1 Figure 6 indicates that noise levels in excess of 85 dB may occur within areas identified as FLL. On the basis of the information currently provided, it is unlikely the proposed mitigation would be capable of achieving the reductions necessary to avoid behavioural disturbance to qualifying bird species. These uncertainties emphasise the importance of avoiding disturbing works in proximity to identified FLL during the winter period. Precautionary Assessment As a result of these uncertainties, Natural England also advises that the Appropriate Assessment should include a precautionary worst-case scenario assessment. This should	FLL as works will not be 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.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		assume that construction activities cannot always be delayed or halted, and that some level of disturbance to birds using FLL will occur. The assessment should then consider the implications of such disturbance for the integrity of the SPA/Ramsar site, taking into account the temporary nature of the disturbance, the distance from the designated site, the availability of alternative habitat, and the effectiveness of the proposed avoidance and mitigation measures. Whilst these factors may indicate that an adverse effect on site integrity can be ruled out, it is unlikely that all disturbance effects can be completely avoided. As an alternative approach, the applicant may wish to investigate opportunities for the temporary enhancement or provision of habitat outside the predicted disturbance zones to offset any temporary reduction in the availability or suitability of FLL during construction. Such measures could provide additional confidence that the functional habitat resource available to SPA/Ramsar bird populations would be maintained throughout the construction period. Cumulative Assessment	

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Finally, the cumulative effects assessment should be updated to reflect any residual disturbance effects that remain following the implementation of avoidance and mitigation measures. This is necessary to ensure that the potential for in-combination effects on SPA/Ramsar bird populations has been fully considered within the Appropriate Assessment and so future developments can appropriately consider their own in combination effect with this project.	
NE8	Predator Shadows	As set out in our comments at NE6, insufficient information has been provided regarding the location of potential FLL areas in relation to the Order Limits. We therefore advise that mapping is provided to clearly show the extent and location of all potential FLL considered within the assessment. This is also important in the context of the predator shadow assessment as the applicant's conclusion that significant effects can be ruled out is based on the assumption that all identified FLL lies beyond the zone of influence of the proposed pylons and is therefore not subject to predator shadow effects. However, where additional areas of FLL are identified,	The Applicant 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 ref. NE5 above, within the assessment of predator shadow effects.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		particularly those located closer to the proposed pylons, this assumption may no longer be valid. In such circumstances, the predator shadow assessment should be revisited and updated to consider the potential effects on birds using these areas.	
NE14	Stage 1 Screening Conclusions	Natural England welcomes the inclusion of noise and visual disturbance effects in the Appropriate Assessment in response to our previous comments. However, as set out under NE5, further consideration is still required regarding the identification and screening of potential Functionally Linked Land (FLL). Until the extent and location of all areas of potential FLL have been clearly established, Natural England does not consider it possible to conclude that all relevant effects have been adequately assessed. In particular, where additional areas of FLL are identified, consideration may be required of the operational effects associated with the long-term or permanent loss of supporting habitat available to SPA/Ramsar bird populations.	Applicant's responses to the matters raised are provided under ref. NE5-NE8 above.

Reference	Topic	Summary of Matters Raised	Applicant's Response
NE15	Collision Risk	The inclusion of consultation with Natural England on the detailed design of bird diverters within the oOEMP is welcomed. DCO Requirement 13 does not specify consultation with Natural England on the oOEMP, however, consultation on the entirety of the OEMP is not likely to be necessary. Nonetheless, NE query whether the requirement could be amended to secure consultation on the diverters, or whether the inclusion of the commitment within the oOEMP is sufficient, given 'The operational environmental management plan must be substantially in accordance with the outline operational environmental management plan'? Natural England note the applicant's statement that it is not appropriate to rely on monitoring as mitigation; agree with this. NE concur with the conclusion drawn in the HRA, but continue to advise that the project should include a scheme of monitoring as a matter of best practise. It is noted that the oOEMP includes ongoing checks and replacement of diverters, which is welcomed, however, monitoring and incident logging is only included in year 1 post installation.	The Applicant does not consider it necessary or proportionate to amend Requirement 13 to require consultation with Natural England on the OEMP solely in relation to bird diverters. The detailed provisions relating to bird diverters are already included within the **OOEMP** (Doc Ref. 7,11 Rev 2). In particular, the **OOEMP** (Doc Ref. 7,11 Rev 2) provides that the specific model and specification of bird diverters will be determined at detailed design stage in consultation with Natural England. The **OOEMP** (Doc Ref. 7,11 Rev 2) also identifies that bird diverters will be installed on those overhead line spans identified through the collision risk analysis as presenting an elevated risk to birds. Requirement 13 requires that the detailed OEMP is substantially in accordance with the **OOEMP** (Doc Ref. 7,11 Rev 2) and implemented as approved throughout operation of the relevant part of the Scheme. The Applicant therefore considers the current drafting to provide an appropriate level of control (and to adequately secure consultation with Natural England) and does

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Monitoring and incident reporting should, ideally, continue for the operational lifetime of the development, or be undertaken at intervals when the Overhead line is new & then later when it is an established feature. It is acknowledged that it is likely not proportionate to undertake extensive VP survey work; instead focus should be on identification of collision victims on the ground. The purpose of this monitoring would be to establish the effectiveness of mitigation by collecting evidence on bird mortality, enabling an adaptive management approach whereby additional bird flight diverters or other mitigation measures can be installed in locations where unforeseen collisions are identified. Natural England therefore recommends the 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	not propose any amendment to Requirement 13. 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 to inform adaptive management to address the balance of Natural England's comments.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		adaptive management measures and the timely removal of carcasses where required.	
NE18	Appropriate Assessment Conclusions	Natural England's position remains unchanged. Further consideration of both disturbance effects and the loss of Functionally Linked Land (FLL) is required within the Appropriate Assessment before it can be concluded that there would be no adverse effect on site integrity.	This is noted by the Applicant. Responses to queries on FLL are provided in the rows above (ref. NE5, NE6 – Precautionary inclusion of additional areas as FLL, NE7 – disturbance of FLL, NE8 – predator shadow effect in precautionary areas of FLL).
BMV5.1	ALC Survey Findings – Mapping	NE does not advocate mapping every isolated auger observation as a discrete polygon. However, neither does NE consider field-average mapping to be an appropriate basis for determining the spatial extent of BMV land. ALC mapping should instead be derived from professional interpretation of the survey evidence, ensuring that coherent areas of higher quality agricultural land are identified and represented where they can reasonably be expected to occur. NE does not consider that the evidence presented demonstrates that field boundaries consistently coincide with changes in soil type or ALC grade across the Site. Agricultural field boundaries are management features and do	The Applicant acknowledges Natural England's position 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

Reference	Topic	Summary of Matters Raised	Applicant's Response
		not necessarily reflect changes in soil properties, wetness, droughtiness or land quality. The use of field boundaries as grade boundaries therefore risks introducing artificial mapping units that do not accurately represent the distribution of agricultural land quality. This concern is reinforced by the Applicant's own findings which identify local variability in topsoil depth, wetness limitations and ALC grade sufficient to produce materially different outcomes between the field-average and auger-by-auger analyses (paras 5.6.15-5.6.17). NE considers that ALC boundaries should be derived from interpretation of the soil survey evidence, landform, drainage characteristics and soil-landscape relationships, rather than being aligned to field boundaries unless there is clear evidence that the field boundary coincides with a genuine change in agricultural land quality. Accordingly, NE remains concerned that the mapped extent and distribution of BMV land may not be fully representative of the survey evidence presented.	distribution of ALC grades. However, such changes would not be expected to result in a material change to the overall impact 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.

Reference	Topic	Summary of Matters Raised	Applicant's Response
BMV5.2	ALC Survey Findings – Mapping	Natural England notes that the post-1988 ALC survey available through the Access to Evidence database cannot be meaningfully compared with the submitted survey due to the absence of detailed profile descriptions, soil logs and field data. However, Natural England's Access to Evidence records state that "Unedited sample point soils data and soil pit descriptions are also available for some surveys". Consequently, it is not clear that the information currently available through the public-facing records represents the full extent of the survey evidence. When requested, Natural England can seek access to the underlying survey records, including sample point data and soil pit descriptions, to facilitate further technical review and comparison. In addition, the Applicant acknowledges that the post-1988 survey identified a mix of Grade 2 and Grade 3a land within the area surveyed, whereas ES Appendix 5-3 reports a mixture of Grades 1, 3a and 3b for the same broad area. This discrepancy reinforces, rather than diminishes, the need to understand the basis for the differing ALC interpretations and grading outcomes. While Natural England	The Applicant 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 would be expected to 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**

Reference	Topic	Summary of Matters Raised	Applicant's Response
		accepts that the post-1988 survey covers only part of Parcel B, the survey nevertheless represents a relevant historical evidence source which should not be discounted solely on the basis that supporting field records are not presently published alongside the mapping. Accordingly, Natural England maintains that the post-1988 survey remains a material consideration and, should uncertainty persist regarding the grading of the land, it may be appropriate to obtain and review any underlying survey records held within the Access to Evidence archive to better understand the reasons for the differing ALC classifications reported across the site.	**Reports** [REP2-015], identify a wetness constraint over parts of the Solar Development Area.
BMV6	ALC Survey Findings – Wetness Class Calculation	NE continues to seek clarification regarding the interpretation of gleying, given the widespread recording of grey and ochreous mottles within soil profiles and the conclusion that gleying was absent from the upper profile. NE considers that this matter remains relevant to confirmation of the reported wetness classifications and associated ALC grades.	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, including 10YR 5/4 and 10YR (or 7.5YR) 3/2. 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 Munsell colour in

Reference	Topic	Summary of Matters Raised	Applicant's Response
			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	NE welcomes the provision of additional pit descriptions, auger logs and photographs. However, concerns remain regarding the	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

Reference	Topic	Summary of Matters Raised	Applicant's Response
		consistency between the evidence presented and the conclusions drawn from that evidence. The auger logs record remarkably similar horizon depths, colours, structures and profile descriptions across extensive areas and separate land parcels. This appears inconsistent with the level of variability described elsewhere in the assessment. In particular, Chapter 5 states that local variation in soil characteristics is sufficient to generate materially different ALC outcomes between the field-average and auger-by-auger analyses, increasing BMV land from 35.2% to 39.2% (paras. 5.6.15-5.6.17). NE also notes an apparent contradiction between the Applicant's position on soil variability. In BMV5.1, local variation is presented as insufficiently meaningful to warrant separate mapping units, whereas elsewhere the Applicant relies upon variation in topsoil depth and profile characteristics to explain differing ALC grades over relatively short distances. The pit photographs and descriptions suggest greater variability in soil horizons than is reflected in many of the auger logs (paras 5.4.9, 5.6.15-5.6.17).	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 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

Reference	Topic	Summary of Matters Raised	Applicant's Response
		NE further notes that the revised reports rely upon archaeological trench exposures to describe soil structure and wetness characteristics. NE accepts that the use of archaeological pits can be appropriate where conventional pit excavation is not practicable. However, the methodology should have been more fully described within the ALC reports and ES Chapter 5. Limited information is provided regarding trench preparation, profile exposure, orientation and confidence in the observations used to determine structure, biopore abundance and slowly permeable layers. Finally, the pit descriptions and logs repeatedly record grey and ochreous mottling within clay subsoils, yet the wetness assessment concludes that gleying is absent within the upper profile. The basis for this interpretation is not clearly explained within the reports & clarification is requested (as per our advice on BMV6). NE does not seek additional survey work in relation to these matters but wishes to draw them to the attention of the Examining Authority when considering the overall robustness of the ALC assessment.	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 would be undertaken against the verified baseline.

Reference	Topic	Summary of Matters Raised	Applicant's Response
BMV10	ALC Survey Results	Natural England's advice regarding the robustness of the ALC surveys (BMV 5-8) is set out above. NE continue to have concerns regarding the ALC survey results which inform the ES assessment, which must be considered in the decision making process.	The Applicant's responses to the comments raised are provided in the relevant rows above.
BMV12	Downgrading of effect magnitude	NE disagrees with the Applicant's decision to reduce the magnitude of effect associated with the permanent loss of BMV land arising from tree and shrub planting. Whilst NE acknowledges that the revised Scheme no longer includes woodland blocks and that permanent habitat creation has been reduced principally to field boundary planting and scattered trees, this does not alter the fact that the planting would result in the permanent withdrawal of areas of BMV land from agricultural production. The affected land would no longer be available for agricultural use and, once established, the planting is acknowledged by the Applicant to represent a permanent land use change that is unlikely to be reversed at decommissioning (paras. 5.7.3, 5.8.14, 5.8.25-5.8.31).	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. 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. The planting of lines of nursery stock could have been presented as having width of less

Reference	Topic	Summary of Matters Raised	Applicant's Response
		The Applicant's assessment identifies approximately 8.3 ha of Grade 1 and 2 land and 10.8 ha of Subgrade 3a land affected by permanent tree and shrub planting, amounting to approximately 19.1 ha of BMV land being permanently removed from agricultural use (Table 5-16; paras. 5.8.14, 5.10.6). The Applicant's adopted methodology defines: • Medium magnitude impacts as permanent irreversible loss of between 5 ha and 20 ha; and • High magnitude impacts as permanent irreversible loss exceeding 20 ha. (Table 5-6; para. 5.4.16) Notwithstanding these thresholds, the Applicant has applied professional judgement to reduce the magnitude of effect associated with permanent tree and shrub planting to a low magnitude impact, principally because the planting is confined to field boundaries and because the habitat features would provide wider environmental benefits (paras. 5.8.3, 5.8.14, 5.8.19).	than 1m and the area and magnitude thresholds calculated accordingly. This approach would yield magnitudes one tenth of those presented. 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.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		NE does not agree that these factors justify a reduction in magnitude. The purpose of the agriculture and soils assessment is to assess the effect on the agricultural land resource. Whilst biodiversity, landscape and soil-function benefits may be relevant to the overall planning balance, they do not reduce the extent of agricultural land that would be permanently removed from agricultural production. Similarly, the location of the planting on field boundaries may influence agricultural management & benefit surrounding land, but does not negate the permanent loss of the agricultural land itself (paras. 5.8.3, 5.8.14). NE therefore considers that the permanent conversion of approximately 19.1 ha of BMV land should be assessed in accordance with the thresholds established within the Applicant's own methodology and that a medium magnitude effect would be more appropriate than the low magnitude effect reported (Table 5-6; paras. 5.8.3, 5.8.14). Consequently, NE does not agree with the Applicant's conclusion that the permanent loss of BMV land resulting from tree and shrub	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 the assessment is contained in Table 5-7 within **ES Chapter 5: Agriculture and Soils** [REP1-014].

Reference	Topic	Summary of Matters Raised	Applicant's Response
		planting represents only a minor adverse effect. In NE's view, the magnitude assigned understates the scale of permanent agricultural land loss and is not fully consistent with the assessment framework presented in Chapter 5 (Table 5-6; Table 5-16;paras 5.8.3, 5.8.14).	
BMV13	Overall Permanent Loss of BMV Land	As stated at BMV12, the purpose of the agriculture and soils assessment is to assess the effect on the agricultural land resource. Whilst biodiversity, landscape and soil-function benefits may be relevant to the overall planning balance, they do not reduce the extent of agricultural land that would be permanently removed from agricultural production. Similarly, the location of the planting on field boundaries may influence agricultural management & benefit surrounding land, but does not negate the permanent loss of the agricultural land itself (paras 5.8.3, 5.8.14). As a result, Natural England continue to advise that the ES conclusions need to be based on overall permanent loss.	As the Applicant has noted in response to BMV12, discussion of how professional judgement was exercised for the assessment is contained in Table 5-7 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.

2.6. National Grid Electricity Transmission (NGET)

2.6.1. The following table provides a response to any new or unresolved matters from NGET's Deadline 2 comments [REP2-024]. Several of the matters raised by NGET in its D2 Written Representation repeated matters which the Applicant responded to in its D2 submissions, namely those set out in **Applicant's Comments on Written Representations** [REP2-014], in respect of matters raised by NGET at Deadline 1 relating to the Applicant's grid connection, NESO Gate status and the management of interactions between NGET and Meridian Solar assets. The Applicant does not repeat those points here, and responds below only where NGET has raised new comments or details in respect of its concerns.

Table 2-5 Responses to new queries raised in the NGET Deadline 2 Submission

Reference	Topic	Summary of Matters Raised	Applicant's Response
1.0	Stand-off Distances	Please refer to paragraph 4 of NGET's Written Representation [REP1-113] which sets out the design work undertaken by it to assess whether the Meridian Solar Project can co-exist with NGET's existing and proposed infrastructure. This concludes that the Application fails to achieve the required design standards – and NGET is not able to ignore current design standards. This is a simple geometrical measurement. In this case, there is a material difference between the instances cited by the Applicant in that (1) the instances are historic, as the Applicant notes; and (2) the instances identified are all overhead lines where both lines are operated and maintained by NGET.	The Applicant reviewed and responded to the technical design standards set out in NGET's Written Representation [REP1-113] within 8.32 Applicant's Comments on Written Representations [REP2-014] The Applicant notes however that the comments in this response that instances raised by the Applicant in respect of close parallel designs being (1) historic and (2) are operated and maintained by NGET, are new issues raised which were not raised in [REP1-113]. The Applicant does not consider it correct that NGET will only approve close parallelling where it controls both overhead lines. As detailed by the Applicant in Section 2.22.16 of Document 8.32

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Where NGET does own both overhead lines where close parallelling occurs, additional measures such as proximity outages can be introduced where NGET is required to do so. Such mitigation measures would be materially more difficult to deliver where the line in close parallel to a NGET line is a privately owned, unlicensed transmission line not licensed on the same terms as NGET. This would be prejudicial to the operation of NGET's undertaking. Please refer to paragraph 4.12 of NGET's Written Representation for further commentary on this issue.	Applicant's Comments on Written Representations [REP2-014]: • On the approach to Tilbury Substation, the YYJ and ZB NGET OHL's have a UKPN 132kV OHL crossing beneath the NGET assets, as well as encircling them (~21m to the east adjacent to a railway line and 26m to the west) • The ZJ 400kV OHL on the approach to Tilbury Substation is ~23m apart from the UKPN 132kV PEA overhead line, as well as operating in a diamond duck-under configuration. In addition to these, the following NGET OHL's across the UK also comprise existing, non-NGET owned overhead lines in parallel. - The NGET 4ZM 400kV OHL runs in ~76m close parallel to an NGED 132kV OHL, north of Tydd Saint Giles. - The NGET ZB 400kV OHL runs in ~30m close parallel to a UKPN 132kV OHL near East Tilbury.

Reference	Topic	Summary of Matters Raised	Applicant's Response
			- The NGET 4YM 400kV OHL runs in ~43m close parallel to a UKPN 132kV OHL near Bramford Substation. - The NGET 4JV 400kV OHL runs in ~77m close parallel to a NPg 132kV OHL near Drax Substation. - The XE 400kV NGET OHL runs in ~43m close parallel to an NGED 132kV OHL near Bothamsall. - The NGET 4ZV 400kV OHL runs in ~48m close parallel to an NGED 132kV OHL near Chesterfield Substation. - The NGET ZD 400kV OHL runs in ~65m close parallel to an NGED 132kV OHL near Staythorpe Substation. Whilst these assets are, under NGET's terminology, 'historic', due to them already being constructed, they evidence that NGET is able to cooperate and coordinate with close parallel third party infrastructure assets across its network. This shows that NGET has already accepted mitigation measures to manage such interfaces. This would be no different to paralleling with the Meridian 4SV OHL, and the Applicant would be willing to coordinate with NGET to incorporate any

Reference	Topic	Summary of Matters Raised	Applicant's Response
			necessary mitigation measures should these be required across the 40-year life span of the OHL. The Applicant notes that protective provisions are routinely agreed on DCOs for this very purpose (i.e., to set out a process by which infrastructure assets operated by different statutory undertakers can be managed in a manner such that they do not detriment the other). The Applicant does not understand NGET to have set out any novel reason why the nature of interaction proposed cannot be managed in this usual manner.
2.0	Stand-off Distances	Reference to the Norwich to Tilbury CPRSS should not be treated as justifying the configuration proposed by the Applicant. This relates to assets that are all owned by NGET. It is correct that the minimum distances between close parallel lines is determined by technical and safety constraints. It is also dependent on the height of the towers. As NG TS 2.04 Issue 6, Section 1.1 sets out: "Overhead line designs for National Grid shall enable the conductor or insulator system to be safely maintained or replaced with one circuit live."	The design parameters stipulated by NGET in its Deadline 2 Response as "*the tallest tower in that section plus vertical LoD, multiplied by 150% ((tower height + vertical LoD) *1.5)*" differ to those set out in by NGET in their Written Response [REP1-113] which stated in Section 4.6 "*The minimum standoff distance should be no less than the height of the tallest tower in that section multiplied by 1.1 times (tower falling distance plus 10%)*". The Applicant requests clarification as to why there are conflicting design parameters being put forward by National Grid. The Applicant also requests further clarification on what "lessons learnt" have driven NGET Design

Reference	Topic	Summary of Matters Raised	Applicant's Response
		NGET's Design Assurance team has properly interpreted this in the context of parallel lines to mean an appropriate standoff is necessary – the word "shall" is used. The standoff is based on Design Assurance's guidance, network security, and lessons learned across the network. The assumed distance of this close parallel will follow the following formula which has been determined to be appropriate by National Grid Design Assurance: The tallest tower in that section plus vertical LoD, multiplied by 150% • (Tower Height + Vertical LoD) * 1.5 NGET's position is that for a 55.5 metre tower as proposed by Meridian, the required standoff distance must be 92.25 metres. Meridian cannot meet this requirement and therefore the schemes cannot co-exist without prejudicing NGET's undertaking and would leave it with a residual hazard that it would have to accept and manage for the operational life of the asset – and which it could not itself manage because of the third-party ownership. NGET cannot commit to a reduced LoD with a private unlicensed transmission owner (refer to paragraph 4.12 of NGET's Written	Assurance to interpret and therefore suggest the stand-off distance parameters stated in NGET's written submissions. As set out by the Applicant, within 8.32 Applicant's Comments on Written Representations [REP2-014] these stand-off distances aren't prescribed in any cited Technical Guidance (including NG TS2.04) but instead appear to reflect the project specific preference / interpretation by NGET in this instance. However, it is clear across the UK transmission network that National Grid can safely operate, maintain and refurbish their assets well within 75m close parallel of other NGET and non-NGET owned assets, whilst enabling the "*conductor and insulator system to be safely maintained or replaced with once circuit live*". Whilst National Grid advise that their understanding of the preferred, minimum stand-off is marginally reduced, NGET have not presented any technical evidence as to why this would impede NGET's ability to maintain its assets in a safe manner, in this specific location. The Applicant has not therefore been presented any justification as to why the stand-off distances provided within its limits of deviation do not provide sufficient flexibility for final design to be coordinated

Reference	Topic	Summary of Matters Raised	Applicant's Response
		Representation). This would affect the delivery of the Grimsby to Walpole project, which is not in the public interest and may well have additional impacts remote from Weston Marsh as a result of constraining NGET's project further away. This has not been considered or addressed by the Applicant. NGET has never received a design proposal from the Applicant that complies with the technical standard or protects NGET's undertaking. Therefore, it has never received a "credible design solution" from the Applicant	between the parties, and the schemes to be operated safely. In respect of the comments made regarding Meridian Solar being a private, unlicensed transmission owner, the Applicant notes that it would pursue a transmission licence, where necessary and appropriate, following grant of consent. The Applicant does not however consider NGET has outlined why the Applicant holding a transmission licence would make any material impact on the management of interfaces between the G2W project and the Scheme. As noted above, protective provisions are the well accepted control by which interfaces between infrastructure are managed within Development Consent Orders. Statutory undertakers have complete flexibility in drafting such protective provisions to ensure all relevant concerns as to interfaces in assets are managed through appropriate design approval processes and controls on matters like ongoing maintenance and operation. If there are operational concerns which NGET holds in respect of the Scheme (such as matters which may be otherwise controlled under a transmission licence), it remains open for NGET to seek these are controlled via protective

Reference	Topic	Summary of Matters Raised	Applicant's Response
			provisions. The Applicant is more than willing to discuss such terms with NGET further. The Applicant notes it sent its comments back to NGET on bespoke protective provisions on 21 August 2026. NGET has not yet provided any response to those comments or engaged in any manner to progress their negotiation.
3.0	Weston Marsh Substation	Notwithstanding NGET's position on the issues with the Meridian Solar Project's connection agreement, please refer to paragraphs 3.9 and 3.10 of NGET's Written Representation for NGET's position on Weston Marsh A substation. NGET does not consider it appropriate or in the interests of good planning that individual developers should unilaterally select connection locations. This attempt to	The Applicant is not seeking to circumvent the Gate 2 offer process. The Scheme has been progressed on a reasonable assumption based on the fact that it previously held a grid connection agreement to a substation at Weston Marsh, which did not identify a specific substation. This was the position throughout the pre-application stage from November 2022, when the grid connection offer was received, to December 2025, when the Applicant was assigned a Gate 1 offer.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		circumvent the Gate 2 offer process has the potential to undermine the proper planning of the NETS. This is because other developers may not be able to access substations or be disadvantaged in doing so if others seek effectively to queue-jump. Facilitating this is not the role of the process under the Planning Act 2008 – a separate connection process exists and must not be circumvented. For the avoidance of doubt, prior to the NESO connections reform process, the Meridian Solar Project was allocated a bay at Weston Marsh A, not Weston Marsh B based upon system engineering, which Meridien cannot override for its convenience. Therefore, it was appropriate for NGET to account for the Meridian Solar Project in its Weston Marsh A substation planning application. The information was then a consideration. However, there has since then been a material change in circumstances in terms of the Applicant's Gate 1 offer and its attempt to gain access to the proposed Weston Marsh B substation. These do not justify the Applicant seeking to attain an access and connection at a completely different substation of its choosing.	The Applicant considers Weston Marsh B is the most logical connection point, having regard to its proximity to the Scheme and the fact that the G2W project remains in the pre-application stage, such that the design of the substation is still being developed. The Applicant also notes the apparent inconsistency in NGET's position. The planning application for Weston Marsh A (H22-0466026) was submitted to South Holland District Council in May 2026, after the outcomes of the Connections Reform process were known. Notwithstanding this, paragraph 3.3.4 of its Planning, Design and Access Statement relies upon Meridian Solar Farm as part of the justification for the need for new grid connection and substation infrastructure in the Weston Marsh area. The Applicant therefore considers that NGET should clarify how its reliance on the Meridian Solar Farm in support of the need for Weston Marsh A consistent with its position in this Examination that the Applicant's proposed connection at Weston Marsh B is "entirely presumptive" and "improperly interferes with NGET's planning of the transmission network".

Reference	Topic	Summary of Matters Raised	Applicant's Response
		The position put forward by NGET in both its Relevant Representation [RR-138] and Written Representation is correct. It is no longer the case that the Applicant has a connection location at Weston Marsh A. This is a material change in circumstances since the preparation of the documents to which the Applicant refers. It is NGET's position that the grid connection being proposed by the Applicant is entirely presumptive and should not be authorised. NGET reiterates its view that the Applicant is seeking to interfere with NGET's proper planning and management of its undertaking and to undermine NESO's management of connections reform and connection offers. The reference to the "Weston Marsh area" (emphasis added) is not the same as a statement that the substation is justified in order to connect the specific project. In any case, since the preparation of that document, there has been a material change in circumstances. The suggestion that in the event of Weston Marsh B substation connections being unavailable or the substation being relocated demonstrates both that there are potential	The Applicant has provided a fuller response to these points at Section 2.22 of the **Applicant's Response to Written Representations** [REP2-014].

Reference	Topic	Summary of Matters Raised	Applicant's Response
		impediments to the delivery of the Meridien Solar scheme and that the application is premature. NGET reiterates that the problems that Meridien faces in this regard are entirely of its own making - as it notes elsewhere, it is proceeding on risk. NGET notes that the Applicant's approach seeks to be proportionate. However, it is entirely speculative; is a proposal pursued (as the Applicant acknowledges) on risk; and it interferes with the undertaking of NGET as the Transmission System Owner and NESO, which is prima facie unreasonable.	
4.0	Compulsory Acquisition Powers in Respect of the Meridian Solar Project	Please refer to paragraphs 6 and 7 of NGET's Written Representation. The restriction proposed by NGET is well precedented and appears in almost all DCOs, as well as in protective provisions in favour of other statutory undertakers such as Network Rail. NGET's approach to protecting its future projects is supported in policy and there is clear precedent for this approach.	The Applicant seeks clarity from NGET as to the legislative and policy support for the restriction of compulsory acquisition powers in favour of land which is not yet owned or subject to operational assets held by NGET. As outlined in 8.32 **Applicant's Comments on Written Representations** [REP2-014], this does not align with the Applicant's understanding of the protections in s 127 and 138 of the Planning Act 2008.

2.7. South Holland District Council

2.7.1. The following table provides a response to any new or unresolved matters from the South Holland District Council's Deadline 2 comments [REP2-033].

Table 2-6 Responses to new queries raised in the South Holland and District Council Deadline 2 Submission

Reference	Topic	Summary of Matters Raised	Applicant's Response
7.1	Landowner and Land Agent Engagement	At the Open Floor Hearing, concerns were raised about the level of engagement between the Applicant and land agents in relation to the project and the land affected. The Applicant advised that this would be followed up. However, I remain concerned that, at this stage of the examination, important questions relating to land and the impact of the scheme are still outstanding. A project of this scale should involve proper and open engagement with those directly affected well in advance of reaching this point in the examination. It is concerning that important questions about the land and the impact of the scheme remain unresolved at this stage.	The Applicant continues to engage, and seek voluntary agreement with, Affected Person(s). The majority of Affected Person(s) form part of the Land Interest Group (LIG) and the Applicant has held meetings with the LIG to progress negotiations to agree Heads of Terms. The Applicant has ensured that agents within the LIG are keeping their clients informed of the ongoing discussions and seeking to meet with landowners directly. Those negotiations towards a template document are nearing completion. The Applicant has met with many landowners and their appointed agents both in person and through online calls to discuss the Scheme and continues to seek to faciliate on site meetings with them, (via their appointed agents or direct to with the landowner). The aim of these meetings is to discuss the impact of the proposed temporary and permanent infrastructure on their land and to mitigate the impact of the Scheme, where reasonably practicable, progressing voluntary agreements through Heads of Terms for an option

Reference	Topic	Summary of Matters Raised	Applicant's Response
			agreement Where landowners do not wish to engage, the Applicant remains committed to seeking to meet with them and is following up to see if their position has changed. It is appropriate that the Applicant continues this iterative process of seeking to acquire land by voluntary agreement, in order to reduce the need to rely on compulsory acquisition powers. **Land Rights Tracker** (Doc Ref. 4.4 Rev 3) provides the current status of negotiations.
7.2	Grid Connection and Loss of Best and Most Versatile Agricultural Land	After watching the Issue Specific Hearing, I remain concerned about the uncertainty surrounding the proposed grid connection and what this means for the Applicant's justification for using significant areas of Best and Most Versatile (BMV) agricultural land. The Applicant confirmed that there is a Gate 1 offer in place, but this does not reserve capacity or guarantee a connection. The hearing also made clear that the final arrangements remain subject to ongoing discussions and other major infrastructure projects. Mr Bassford, representing National Grid, stated: *"At this stage, the appropriate point is not*	The Applicant maintains that the Application has not been submitted prematurely and refers to its post-hearing submission note included on pages 47 and 48 of **Written Summary of Oral Submissions at ISH1** [REP1-098], Section 2.22 of **Applicant's Comments on Written Representations** [REP2-014] and within Table 2-5 of this document with regards to its position. To respond to the BMV and Site-selection queries raised by the Examining Authority at ISH1, the Applicant submitted a **Post ISH1 Note: Strategic Site Selection** [REP2-017] at Deadline 2.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		to authorise the grid connection, as its destination, its route, its approach are uncertain and it is premature to authorise it." This raises questions about the deliverability of the proposed development and is particularly relevant to the site-selection process.	
7.3	Loss of Best and Most Versatile Agricultural Land	The Applicant has indicated that BMV land was unavoidable because of the search area associated with the proposed grid connection. If that connection remains uncertain, I believe it is reasonable to question whether the justification for selecting these sites remains sufficiently established.	
7.4	Loss of Best and Most Versatile Agricultural Land	The Examining Authority also raised BMV land in the context of paragraph 4.3.15 of National Policy Statement EN-1, which requires impacts on agricultural land to be considered and impacts on BMV land to be minimised. I do not believe BMV land should simply be accepted as unavoidable because of the way the search area has been defined. This is some of the best agricultural land in the country, producing food and supporting farming businesses, employment and the local economy. I believe its loss or long-term change of use should be	To respond to the BMV and site selection queries raised by the Examining Authority at ISH1, the Applicant submitted a **Post ISH1 Note: Strategic Site Selection** [REP2-017] at Deadline 2. In addition, as set out within the **Relevant Representations Report** [REP1-074], the development of the Site layout has been informed by agricultural land classification surveys. This can be evidenced from areas of Grade 1 BMV land excluded from physical development within Parcel C and set aside as a habitat management area, where agricultural land use is to be retained. In

Reference	Topic	Summary of Matters Raised	Applicant's Response
		given significant weight, particularly given the increasing importance of food security.	total, over 69ha of Grade 1 and 2 agricultural land has been excluded from physical development and will be kept in arable use through habitat management areas and managed to provide biodiversity benefits. Other areas of Grade 1 land within the Solar Development Area comprise small pockets of land or narrow slivers which would have limited potential for arable use if left undeveloped within the Scheme layout. Furthermore, excluding further areas would compromise the objective of the Scheme to deliver 750MW of energy capacity. All 132 kV On-Site Substations have been located on Grade 3b (non-BMV) land. However, it has not been possible to avoid the use of Grade 1 and Grade 3a land for the 400kV On-Site Substation and BESS Compound, with detailed consideration of the options set out within paragraphs 3.6.24-3.6.28 and Table 3-6 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054].

Reference	Topic	Summary of Matters Raised	Applicant's Response
			Defra's UK Food Security Report 2024[3] identifies that "food production levels can be maintained or increased alongside the land use change required to meet our Net Zero and Environment Act targets". Land use change associated with solar development is not identified as a risk to food security in the UK.
7.5	Loss of Best and Most Versatile Agricultural Land	There were also questions about whether the land would genuinely be restored following decommissioning. The Applicant's post submission BMV Land Take document identifies approximately 15 hectares of hardstanding which it considers could not be returned to its previous Agricultural Land Classification (ALC) following deconstruction. This raises a significant question as to whether this element of the land loss can properly be regarded as temporary, particularly where the Applicant's own documentation identifies that the land may not be capable of being returned to its previous agricultural condition.	The Applicant's position on land restoration is set out within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099]. Where uncertainty remains with regards to the restoration of land to the same grade within the timeframe of decommissioning, **ES Chapter 5: Agriculture and Soils** [REP1-014] has assumed a permanent effect for a precautionary assessment, on the basis that it may not be possible to achieve the land's pre-development ALC grade by the end of the decommissioning phase. The Applicant expects the pre-development ALC grade to be achieved within a few years. The extended period is required to restore biological activity to the

[3] Defra (2024). United Kingdom Food Security Report 2024. Available at: https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024 [Accessed 26/10/2026]

Reference	Topic	Summary of Matters Raised	Applicant's Response
			subsoil through the methods set out within the **OSMP** (Doc Ref. 7.14 Rev 2).
7.6	Flood Risk, Drainage and Water Supply	Flood risk was also raised by the Examining Authority as part of the site-selection discussion. The Environment Agency has raised concerns around flood risk and water resources, including matters relating to Crowland and Cowbit Washes and the South Holland Main Drain. There are also concerns about existing flood flow routes potentially being interrupted. Given the nature of this area and the importance of our drainage infrastructure, I believe these matters need to be satisfactorily addressed and supported by sufficient evidence before the Examining Authority can be satisfied that the development can be delivered safely without unacceptable effects on the existing drainage and water environment.	The updated **Statement of Common Ground with the Environment Agency** (Doc Ref. 8.12 Rev 2)confirms that these matters with the EA have either been addressed and agreed, or are currently under discussion. The Applicant will continue to work with the EA to ensure that any remaining matters are satisfactorily resolved.
7.7	Flood Risk, Drainage and Water Supply	The Examining Authority also raised the safety of construction workers in relation to flooding. The Applicant indicated that welfare facilities would be raised above flood levels, although their exact locations remained flexible. The	An **Outline Flood Emergency Response Plan** [REP2-005] was submitted by the Applicant at Deadline 2 to address these concerns raised by the Examining Authority.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		hearing demonstrated why flexibility has to be carefully considered where facilities need to remain accessible and safe during construction, particularly in an area where flood risk and drainage are significant considerations.	
7.8	Flood Risk, Drainage and Water Supply	Anglian Water has also raised concerns about the proposed water supply. The Applicant has suggested that water could be tankered to the site, but has acknowledged that mains water may be required. A water resources assessment was requested because of the lack of detail, while the Applicant indicated that this would not be provided. A water supply strategy is expected through the examination, and I will await that information. However, I remain concerned that such basic requirements for a development of this scale have not yet been fully established.	A **Water Supply Strategy** [REP2-019] was submitted by the Applicant at Deadline 2 to address these matters raised by Anglian Water Services. The Applicant will continue to engage with Anglian Water Services and Environment Agency on these matters and will track engagement through the SoCGs with these parties.
7.9	Construction and Cumulative Impact on Local Communities	The Applicant confirmed that all four development areas are intended to be constructed concurrently. This is important because the impact on local communities and infrastructure will therefore be experienced cumulatively, with construction traffic, noise, disturbance, drainage impacts and environmental effects across the different	A response to the Examining Authority's query was provided by the Applicant within the **Written Summary or Oral Submission at ISH1** [REP1-098], as a post-hearing note on pages 27-29. The Environmental Statement has identified worst-case environmental effects of the Scheme on the basis of all parcels of the Solar Development Area being

Reference	Topic	Summary of Matters Raised	Applicant's Response
		areas potentially being experienced simultaneously. The Examining Authority itself questioned whether a concurrent construction programme could be disruptive to local communities and whether a phased approach might reduce those impacts. I believe this needs to be considered alongside the wider cumulative impact of other major developments taking place or being proposed within the area. Residents do not experience individual planning applications in isolation. The same rural roads, drainage systems, agricultural land, landscape and communities would be utilised and impacted by multiple projects. The cumulative effects of construction therefore need to be considered realistically, including the potential for construction activity from different developments to overlap. This is particularly important in South Holland, where communities are already facing, or may face, a significant concentration of solar, battery, grid and other major infrastructure proposals. The cumulative impact is not simply the combined footprint of individual projects. It is also the combined effect on the rural road	constructed concurrently. This represents the worst-case assessment for the EIA. In addition, **ES Chapter 4: Overview of the EIA Process** [APP-055] explains the assessment methodology for the cumulative effects assessment. This includes considering two scenarios, where the first scenario assumes that the peak construction of all of the cumulative projects overlaps with that for the Scheme, and the second scenario assumes that the projects are built out sequentially, with no overlap in peak construction periods but a longer overall cumulative construction period. Each of the ES technical assessments then considers which of these scenarios represents the worst-case for the specific technical assessment and has assessed cumulative effects on that basis.

Reference	Topic	Summary of Matters Raised	Applicant's Response
		network, agricultural land, drainage infrastructure, landscape, wildlife and the communities who will experience these developments over a prolonged period.	
7.10	Ornithology	Concerns were raised around bird collision risk associated with the increasing amount of overhead infrastructure in the area, particularly around the proposed new substations at Weston Marsh. During the hearing, the Applicant confirmed that cranes, whooper swans and geese are present in the area. Concerns were also raised about birds colliding with existing electricity infrastructure. Mr Pennington described finding three swans deceased as a result of striking an electricity line in fog, highlighting the potential risk associated with overhead infrastructure in poor visibility. With Meridian, National Grid and other proposed developments potentially connecting into the proposed Weston Marsh substations, there is the potential for a significant increase in overhead infrastructure and cabling. The cumulative impact this could have on birds, and other wildlife therefore needs to be properly considered.	As set out within the **Written Summary or Oral Submission at ISH1** [REP1-098], the Applicant has undertaken a collision risk assessment for the Scheme and specified use of bird diverters for areas of increased collision risk. An in-combination assessment with cumulative schemes has also been undertaken. Natural England is in broad agreement with the Applicant's assessment of collision risk, as set out within the **Statement of Common Ground with Natural England** (Doc Ref. 8.13 Rev 1). The provision of bird diverters is secured through the **Design Parameters** (Doc Ref. 7.4 Rev 3) and the **OOEMP** (Doc Ref. 7.11 Rev 2). In accordance with the **OOEMP** (Doc Ref. 7.11 Rev 2), specific model and specifications of the diverters will be determined at detailed design, in consultation with Natural England. This would include the consideration of models that are visible at night and in low light conditions.

Reference	Topic	Summary of Matters Raised	Applicant's Response
7.11	Ornithology	The Applicant referred to utilising line markers as a mitigation measure. However, I remain concerned about how effective these would be in poor visibility on foggy days, particularly where bird collisions with existing infrastructure have already been raised during the hearing. I therefore ask the Examining Authority to consider not only the proposed pylons and new overhead cabling associated with Meridian Solar in isolation, but also the cumulative bird collision risk arising from Meridian alongside existing and proposed overhead infrastructure in the area.	Further details of the assessment and mitigation specified are provided within **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 2).
7.12	Employment and Community Benefits	The proposal includes a number of claimed employment and community benefits. I recognise that these may provide some benefit to the local area, but I believe it is important to consider their nature, scale, and how securely they would be delivered.	Responses to the specific matters raised are provided in rows below.
7.13	Employment	The Applicant has stated that around 207 jobs would be created during construction, but only around 11 net full-time equivalent operational jobs have been identified. I recognise that the project could bring temporary economic benefits through construction employment. However, the hearing also raised the potential	As acknowledged in the Applicant's response to SHDC-043 within Table 2-2 of **Relevant Representations Report** [REP1-074], the ES does not include a bespoke assessment of effects on businesses along the wider agricultural supply chain, including downstream food-processing businesses. The Applicant's response to SHDC-043

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		loss of existing agricultural employment and associated downstream food-processing employment as productive agricultural land is taken out of use. I believe these potential employment losses should be properly considered alongside the employment created by the development when assessing its overall economic impact. I therefore ask the Examining Authority to consider the wider net employment impact of the proposal, including both the employment it creates and any agricultural and downstream employment that could be lost as a result of taking productive agricultural land out of use.	sets out why no loss of agricultural employment is anticipated, either during construction or operation: the Solar Development Area is farmed by the landowners themselves rather than tenants, those landowners will continue to receive income from the land, and any contractors involved in farming activities are not considered wholly reliant on it for their livelihood. As no agricultural employment loss has been identified at the farm level, there is not expected to be a substantial consequential loss of downstream food-processing or supply chain employment that would follow. The Applicant acknowledges the Council's broader point that operational job numbers are modest relative to the scale of the Scheme. As set out in the Applicant's response to SHDC-043, the **OSSCEP** (Doc Ref. 7.17 Rev 2) is intended to maximise the proportion of these jobs, and the wider economic opportunity created by the Scheme, that is taken up locally.
7.14	Proposed Permissive Path	The proposed 20-metre-wide permissive path between Queens Bank and Shepeau Stow, connecting existing Public Rights of Way (PROW), could be a positive benefit for the local community. However, Lincolnshire County Council has requested that it should be	In accordance with landowner agreements, land within the Order Limits would be returned to the relevant landowners once the decommissioning phase has been completed. The Applicant is committed to return the land to the landowners in a condition where its previous agricultural use can

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		made a permanent PROW rather than a permissive path. I support this request. A permissive path is different from a permanent PROW and, as currently proposed, would only remain for the duration of the scheme, with the landowner being able to withdraw access at any point. If this is intended to provide a lasting community benefit, I believe it should be made permanent so that local people can continue to use it after the development has been decommissioned.	be continued. As such, the Applicant is not able to propose permanent Public Rights of Way within the Order Limits, as it would not allow the delivery of the commitments set out within the landowner agreements with regards to the land being returned to its previous agricultural use. A response to LCC's query was provided by the Applicant within the **Written Summary or Oral Submission at ISH1** [REP1-098] and within Table 3-6 of **Applicant's Comments on Local Impact Reports** [REP2-015], row 6.11.
7.15	Battery Energy Storage System	The Applicant has referred to the Battery Energy Storage System (BESS) as a community benefit because of its contribution to the wider electricity system. I recognise the wider benefits of energy storage and the potential role of BESS in supporting the electricity network. However, I do not believe infrastructure which forms part of the Applicant's own scheme should automatically be presented as a community benefit. The wider energy system benefits of the BESS should be distinguished from additional benefits provided specifically to the communities affected by the development.	Section 4.3 of the **Planning Statement** [APP-260] presents the BESS as a benefit of the Scheme. The Applicant recognises that this may not present a benefit at a local community level, however the co-location of BESS as part of the Scheme provides an opportunity to respond to the misalignment between energy generation and peak consumption periods, through the 'load-shifting' and smoothing out of electricity to meet demand. In addition, this supports energy security through a reduced risk of blackouts and brownouts. The Applicant sees no reason why the BESS cannot be described as a benefit of the Scheme given the role it plays in achieving net zero, providing flexibility to the energy system, to

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			reduce costs and increase reliability, as identified in paragraphs 3.3.35 and 3.3.26 of EN-1. This conclusion has been reached in other solar DCO decisions, including Green Hill Solar.
7.16	Community Benefit Fund	The proposed £500,000 per annum Community Benefit Fund is another area where I remain concerned. Whilst the Examining Authority made it clear during the hearing that the Community Benefit Fund (CBF) sits outside the examination and is not a matter for the Secretary of State to determine as part of the DCO, it was questioned why the fund had not been included within the scheme and why it had not been secured through the DCO or a Section 106 agreement. The Applicant's own Post-Submission Application Document 8.30 – Post ISH1 Note states: "*4.2.1. The Applicant does not propose to secure the community benefit fund within the DCO or via an associated planning agreement.*" The Applicant then states: *"4.2.2. Although the CBF is not secured by a planning agreement, the Applicant remains committed to delivering the CBF should the Scheme be granted consent."* I recognise the Applicant's stated commitment to providing the fund and its intention that	The Applicant provided a detailed explanation of its approach to the proposed Community Benefit Fund including why it is not appropriate to secure the Fund within the DCO at Deadline 1 in **Post ISH1 Note: Community Benefit Fund** [REP1-100]. The Applicant does not propose that any weight is attached to the Community Benefit Fund in applying the planning balance as set out in paragraphs 4.3.17 to 4.3.19 of the **Planning Statement** [APP-260].

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		communities living closest to the Scheme should benefit from it. However, a commitment is not the same as a formally secured obligation. By choosing not to secure the fund through the DCO or an associated agreement, there is no formal mechanism within the scheme providing the same certainty that the £500,000 per annum will actually be delivered. If the Applicant intends to provide this funding if consent is granted, I do not understand why there should be an issue with formally securing that commitment. Doing so would provide greater clarity and certainty for the communities who would be affected by the development. I therefore ask the Examining Authority to consider carefully what weight should be given to the proposed Community Benefit Fund when it is not formally secured, and whether the Applicant's stated commitment should be secured through an appropriate mechanism if the fund is to be relied upon as a benefit of the Scheme.	