



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Meridian Solar Farm

Case Reference: EN010169

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

10 July 2024

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1. INTRODUCTION

- 1.0.1 On 30 May 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Meridian Solar Farm Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Meridian Solar Farm (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:
<http://infrastructure.planninginspectorate.gov.uk/document/EN010169-000010>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
21.1	Figures 2.1, 2.2 and 2.8	Clarity of figures	<p>The overlapping colours used within Figure 2.1 Hydrological Constraints make it difficult to determine the extent of the Flood Zones. Figures within the ES should be clearly legible and avoid overlapping constraints where this could potentially cause confusion.</p> <p>In the absence of clear labelling on Figure 2.2, Cowbit Wash Site of Special Scientific Interest (SSSI) is not identifiable. In addition, access route T1 is shown on the key of Figure 2.8 but is not visible on the figure. Features should be easily identifiable on figures within the ES.</p>
21.2	Section 2.2	Site context	<p>Section 2.2 Site Context states that the main land use across the site is agricultural and does not identify any other land uses. The Agriculture and Soils chapter subsequently identifies additional urban features within the site boundary and also refers to made ground in the site which could be potentially contaminated (but does not provide details on its nature or location).</p> <p>The introductory chapters of the ES should include a clear description of the existing land use so that the environmental baseline can be clearly understood from the outset.</p>
21.3	Section 2.3	Flexibility	<p>At this stage of development, the number and locations of project elements such as construction compounds, the Battery Energy Storage System (BESS) and on-site substation(s) have not been determined.</p> <p>The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are</p>

ID	Ref	Description	Inspectorate's comments
			<p>not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced.</p> <p>Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters/ commitments that have informed the assessment.</p>
214	Para 2.5.35	Landscaping	<p>The Applicant is proposing to plant “<i>small, isolated blocks of woodland</i>”. Gedney Hill Parish Council states this is not in keeping with the existing landscape and Lincolnshire County Council note that tree planting can be very destructive to underlying archaeological remains. All landscaping should be well considered, and the Applicant should seek to agree the location and types of planting with relevant consultation bodies. The ES should explain and justify the assumptions made in respect of the growth rates of planting proposed to mitigation effects.</p>
215	Section 2.6	Electricity export connection to Weston Marsh substation	<p>The Scoping Report does not identify whether any works would be required at the Weston Marsh substation that would be included in the DCO works. The likely significant effects from such works should be assessed within the ES, either as part of the Proposed Development, or in the cumulative effects assessment if they are to be consented separately.</p>
211	Section 2.7	Construction activities	<p>The Scoping Report does not at this stage detail anticipated construction activities/methodologies. Section 2.7 identifies the potential for piling although does not detail the type to be used. The ES should clearly describe the construction activities insofar as is reasonably possible; this will be particularly pertinent for the Noise and Vibration assessment.</p>

ID	Ref	Description	Inspectorate's comments
212	Paragraph 2.7.1	Construction period	<p>The Scoping Report gives varying lengths for the construction phase, for example paragraph 2.7.1 states at least 24 months, whereas Table 4.8 states up to 36 months. The construction period should be clearly defined and consistent throughout the ES.</p> <p>The ES should provide details of the anticipated construction working hours (including any night-time working required) and activities on which the assessments of likely significant effect have been based. This should be consistent with the working hours specified in the draft Development Consent Order (dDCO).</p>
213	Para 2.5.30	Potential highways improvement works	<p>It is unclear whether any highways improvement works required to facilitate access to the site would be included as part of the Proposed Development or would form separate planning applications. The likely significant effects from such works should be assessed within the ES, either as part of the Proposed Development, or in the cumulative effects assessment if they are to be consented separately.</p>
214	Section 2.8	Operation	<p>The ES should describe the potential scope and duration of maintenance works that would be required during the operation of the Proposed Development, including predicted vehicle movements and staffing numbers. Details should also be provided on any monitoring to be undertaken.</p>
215	Table 4.4	Watercourse crossings	<p>The methods to be employed for watercourse crossings should be detailed within the ES. Should trenchless installation be relied upon to mitigate potential significant effects, the Applicant should ensure this construction method is demonstrably secured.</p>
216	Table 4.9	Vehicle movements	<p>The number of vehicle movements is key to a number of environmental aspect assessments. Construction and operational phase movements are estimated in the Traffic and Access chapter and Air Quality chapters of the Scoping Report, respectively.</p> <p>The number of anticipated vehicle movements should be confirmed upfront in the Project Description chapter of the ES. The assumptions made in reaching these estimates should be detailed.</p>

ID	Ref	Description	Inspectorate's comments
21.7	n/a	Figures	Whilst a scale is provided within the key to figures, scale bars have not been provided. For ease of understanding, scale bars should be used.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
221	Paras 2.7.12 – 2.7.16 and Section 3.9	Management plans	<p>The Scoping Report identifies a number of management plans that will be produced as part of the DCO application, including:</p> <ul style="list-style-type: none"> • Outline Construction Environmental Management Plan (CEMP); • Outline Landscape and Ecological Management Plan (LEMP); • Outline Decommissioning Environmental Management Plan (DEMP); • Outline Construction Traffic Management Plan (CTMP); • Outline Soil Management Plan (SMP); and • Site Waste Management Plan (SWMP). <p>The outline plans should be sufficiently detailed to provide confidence in the delivery of mitigation, particularly that relied upon within the ES to avoid or reduce significant effects.</p>
222	Para 2.9.6	Assessment of decommissioning	<p>Paragraph 2.9.6 states that “<i>the effects of decommissioning.....will be considered where possible in the relevant sections</i>”. An assessment of decommissioning should be undertaken wherever significant effects are likely to occur. Aspect specific comments are provided in Section 3 of this Opinion, where the Applicant has requested to scope out specific matters.</p>
223	Paras 3.6.12 and 3.6.13	Cumulative effects – list of projects	<p>The Inspectorate agrees that minor developments are unlikely to have a significant interaction with the Proposed Development and can be excluded from the short list of reasonably foreseeable future projects cumulative effects assessment (unless within the site boundary or permitted development associated with the scheme). However, some planning applications granted over three years ago may have a</p>

ID	Ref	Description	Inspectorate's comments
			<p>commencement date of greater than three years (eg DCOs) and these should not be excluded from the assessment.</p> <p>The Applicant should define the timeframes meant in respect of inclusion of only applications “<i>proposed to be delivered before or shortly after construction of the Scheme</i>”.</p> <p>Table 3.5 of the Scoping Report omits other solar projects in the region, as well as other Nationally Significant Infrastructure Projects (NSIPs) in Lincolnshire (eg Outer Dowsing Wind Farm and Easter Green Link 3&4). The Applicant should identify all relevant projects for inclusion in the assessment and should seek agreement on these with relevant consultation bodies. The list of projects should be kept under review whilst preparing the ES.</p>
224	Para 3.6.13	Cumulative effects - operational phase	<p>The Scoping Report refers to assessing projects which overlap with the construction period of the Proposed Development. The ES should also assess the operational phase where significant effects are likely to occur. This may include, but should not be limited to, cumulative economic impacts from the loss of agricultural land.</p>
225	Para 3.5.1	Reporting of significant effects	<p>The Scoping Report states that only residual effects will be reported within the assessment of significant effects in the ES. The Inspectorate considers that the significance of effects prior to the implementation of mitigation measures should also be reported. This is to enable an understanding of the anticipated effectiveness of mitigation measures.</p>
226	n/a	Baseline conditions	<p>The Scoping Report does not present a baseline description for the whole of the site boundary in each aspect chapter, for example Ecology and Biodiversity and Agriculture and Soils only provide baselines for the PV area.</p> <p>The ES should describe the baseline conditions of the entire application site and surrounding areas where significant effects are likely.</p>

ID	Ref	Description	Inspectorate's comments
227	n/a	Residues and emissions	The ES should provide an estimate, by type and quantity, of anticipated residues and emissions resulting from construction and operation of the Proposed Development, as required by Schedule 4(1)(d) of the EIA Regulations 2017.
228	n/a	Competent experts	The ES must be accompanied by a statement from the Applicant outlining the relevant expertise or qualifications of such experts, as required by Regulation 14 of the EIA Regulations 2017.
229	n/a	Use of standard terminology	The ground level on page 99 is described using the term " <i>aerosol optical depth (AOD)</i> " rather than the typical term "Above Ordnance Datum" used for this abbreviation. The Inspectorate assumes this to be an error. Standard terminology should be used where possible.
2210	n/a	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, links for which can be found in paragraph 1.0.7 above.</p>

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Climate Change

(Scoping Report Table 4.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.1	Table 4.1	Lifecycle Greenhouse Gas (GHG) Impact Assessment – Operational Traffic Emissions	On the basis of the information presented within the Scoping Report identifying limited vehicle movements associated with the operational and maintenance phase (7 Light Duty Vehicles (LDV) and 7 Heavy Goods Vehicle (HGV) movements per day), the Inspectorate agrees that significant effects are not likely and that this matter can be scoped out of further assessment. However, the ES description of development should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.
31.2	Table 4.1	Climate Change Adaptation and Resilience - Construction and Decommissioning Phase	Page 65 of the Scoping Report states that the CEMP would include " <i>Health and Safety plans for construction and decommissioning activities to account for potential climate change impacts on workers, such as flooding and heatwaves</i> ". On the basis that an outline CEMP is submitted with the DCO application that includes such measures and taking into account the short-term duration and nature of construction and decommissioning works, the Inspectorate agrees that effects are not likely to be significant and can be scoped out.

ID	Ref	Description	Inspectorate's comments
31.3	Table 4.1	Assessment Methodology	Page 62 of the Scoping Report states that " <i>sources of emissions that are not expected to result in a material contribution to the overall Scheme</i> " will be excluded from further assessment. The ES should define what is considered to be a material contribution. Consideration should be given to the potential for cumulative effects of the excluded sources to add up to a material contribution.

3.2 Cultural Heritage

(Scoping Report Table 4.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
322	Table 4.2	Conservation areas	Page 69 of the Cultural Heritage chapter identifies a single conservation area (Moulton), located approximately 360m from the application site. Additional conservation areas are noted elsewhere in the Scoping Report; these are located outside the 1km study area (Crowland and Spalding). For the avoidance of doubt, the potential for likely significant effects on all relevant conservation areas should be assessed within the ES.
323	Table 4.2	Archaeological surveys	<p>The Scoping Report does not state that intrusive investigations such as trial trenching will be undertaken. Historic England and Lincolnshire County Council have advised the need for a programme of trial trenching to identify the potential for unknown archaeological assets. Lincolnshire County Council also highlight the need to undertake a higher percentage of trenching where geophysical surveys are not undertaken. The Applicant should make effort to agree the need for intrusive investigations with relevant consultation bodies. Where necessary, intrusive investigations should be completed prior to submission of the DCO application.</p> <p>The need for and content of a Written Scheme of Investigation (WSI) should also be discussed. The ES should explain the extent to which this has been agreed and how it would be secured e.g. via a suitable DCO requirement.</p>

ID	Ref	Description	Inspectorate's comments
324	Table 4.2	Access to land	Where access to land is not available to undertake appropriate surveys to inform the baseline, it is stated that professional judgement will be used to determine the baseline from available research and data to assess archaeological potential. Lincolnshire County Council note that trial trenching will be required to test 'blank areas' (ie where archaeology is not identified through desk-based assessment or geophysical surveys). It states that trial trenching blank areas on other NSIPs has resulted in the identification of significant areas of archaeology. Should access not be possible, the ES should detail (and assess) any necessary flexibility and mitigation required to accommodate any risk.
325	Table 4.2	Potential impacts	The Scoping Report provides limited detail regarding potentially significant impacts on cultural heritage. For clarity, the ES should consider potential impacts including noise, visual, vibration, landscaping, lighting. All elements of the Proposed Development should be considered including haul roads and construction compounds. Both below ground and above ground impacts should be assessed.
326	n/a	Indirect effects	Indirect effects are not considered in Table 4.2. The ES should identify and assess any likely significant indirect effects on the historic environment, for example, changes in drainage patterns or compression of the ground from infrastructure which could affect below ground heritage assets or lead to subsidence of above ground buildings and monuments.

3.3 Ecology and Biodiversity

(Scoping Report Table 4.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 4.3	Habitats sensitive to dust or air pollution – construction and decommissioning	Page 78 of the Scoping Report states that the habitats on the PV areas comprise arable farmland, ditches, isolated areas of plantation woodland, a small number of hedgerows and small parcels of scrub. Habitats along the grid corridor and cable connection corridors have not been identified at this stage, therefore the Inspectorate is unable to agree that there are no habitats sensitive to dust or air pollution; this matter cannot be scoped out at this stage. The ES should include an assessment of effects on habitats from dust deposition, or information demonstrating agreement with the relevant consultation bodies that there would not be a likely significant effect.
332	Table 4.3	Collision risk to birds from tall cranes – construction and decommissioning	The Inspectorate notes that the use of tall cranes would be short term and localised during construction and decommissioning. The Inspectorate agrees that significant effects are not likely and that this matter can be scoped out.
333	Table 4.3	Hydrology or water pollution effects – operation	Page 85 of the Scoping Report states that the Proposed Development is not anticipated to result in any hydrology or water pollution effects during operation. This is contrary to page 94 (Table 4.4 Hydrology, Flood Risk and WFD) which identifies potential effects on drainage patterns, surface water flows, flooding and the potential for pollution from flushing of silts and hydrocarbons from areas of hardstanding. As such, the Inspectorate does not agree that this matter can be scoped out. The potential effects from such events on ecological receptors should be assessed within the ES, where significant effects are likely.
334	Table 4.3	Species/groups: - fish;	Pages 85-86 of the Scoping Report propose to scope out assessment of these species/groups due to a lack of suitable habitat, not being in the known

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> - aquatic invertebrates; - white clawed crayfish - terrestrial invertebrates; - hazel dormouse; - red squirrel; - pine marten; - badger; and - reptiles. 	<p>geographical range and/or the site not considered to be able to support important populations.</p> <p>As noted below (see ID 3.3.5), the baseline presented in the ES appears to relate only to the PV area. The baseline for the grid connection and cable connection corridors has not been provided. The Inspectorate is therefore unable to agree that any species/groups can be scoped out at this stage with the exception of pine marten and red squirrel; this is on the basis that the Inspectorate acknowledges their geographical ranges do not overlap with the application site. The ES should present an assessment of effects on these species, or evidence of agreement with relevant consultation bodies that they can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
335	Table 4.3	Study area	<p>The Scoping Report proposes a 15km study area for internationally designated sites and a 2km study area for non-statutory designated sites. The study areas should reflect the Proposed Development's Zone of Influence (ZOI) rather than being based on a fixed radii; for example, a fixed radii may not be appropriate for sites supporting mobile/migratory bird species. The selection of sites should be informed by Natural England's Impact Risk Zones.</p>
336	Table 4.3.1	Baseline conditions – internationally designated sites	<p>The Wash Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site lie within the 15km study area for internationally designated sites but have been omitted from Table 4.3.1. The ES should assess the potential impacts on these sites.</p>

ID	Ref	Description	Inspectorate's comments
33.7	Table 4.3	Baseline conditions – nationally designated sites	Sites of Special Scientific Interest (SSSIs) have not been considered within the ecological baseline section. The ES should confirm the presence or absence of SSSIs which could be potentially impacted by the Proposed Development.
33.8	Table 4.3	Baseline conditions – geographical coverage	<p>For a number of species/groups, baseline conditions are specifically identified for the PV area only. For some species/groups it is not clearly specified, although there is no indication that the desk study or survey effort has extended beyond the PV area.</p> <p>The ES should detail the baseline environment for the entire application site, and surrounding areas as relevant, and the assessment of effects should also reflect this.</p>
33.9	Table 4.3	Baseline conditions - Grimsby to Walpole project	Page 80 of the Scoping Report refers to National Grid's proposed Grimsby to Walpole project, for which a DCO application is currently being prepared. It states that for the purpose of scoping, it will be assumed that this project will be constructed. The Inspectorate is unclear what is meant by this statement. For clarity, the ES should assess impacts against the existing baseline and cumulative effects with other projects should be assessed accordingly.
33.10	Table 4.3	Invasive plants	Page 79 of the Scoping Report notes that a number of invasive non-native species (INNS) were identified through the data search. No further reference is made to INNS. The ES should assess the potential for the Proposed Development to spread INNS, report on any likely significant effects and identify relevant mitigation measures.
33.11	Table 4.3	Bird surveys	The Scoping Report states that wintering bird surveys and breeding bird surveys of the PV area were designed 'using a landscape sampling approach' using six pre-defined transects. The Applicant is advised to seek agreement on the sufficiency of survey effort with relevant consultation bodies including Natural England, South Holland District Council and Lincolnshire County Council.

ID	Ref	Description	Inspectorate's comments
			Page 81 states that Vantage Point surveys have been undertaken in the grid connection corridor. The results of these surveys have not been presented within the Scoping Report; these should be included in the ES.
33.12	Table 4.3	Potential impacts – collision risk from overhead lines	Collision risk to birds during operation is mentioned on pages 81 and 85 of the Scoping Report, but not identified as a potential impact on page 83, nor in Table 5.1 Proposed Scope of ES. For clarity, the Inspectorate expects this matter to be assessed, where significant effects are likely.
33.13	Table 4.3	Mitigation - operation	Page 84 of the Scoping Report identifies the potential creation of “ <i>grassland around the PV Area to improve carrying capacity to support ground nesting bird populations to compensate for loss and degradation of habitat</i> ”. The ES should demonstrate that all efforts have been made to mitigate potential effects as far as practicable prior to the proposal for compensation measures, taking into account the mitigation hierarchy detailed on page 84.
33.14	Table 4.3	Mitigation – decommissioning	The Scoping Report states that habitats created as part of the Proposed Development could be lost during decommissioning. It further states that any created habitats should be compensated through the creation of higher value habitats at decommissioning. Given that the Applicant proposes to return the land to the relevant landowners after decommissioning, the Inspectorate queries the practicalities of this suggestion. The ES should clearly identify any such limitations in the assessment of decommissioning.
33.15	Table 4.3	Assumptions and limitations	Page 85 of the Scoping Report assumes that hedgerows and trees, watercourses and mixed scrub habitats will be retained as part of the Proposed Development. Page 109 refers to the potential for the removal of some small areas of vegetation. The Applicant should ascertain the need for vegetation removal whilst preparing the application and the ES should assess the effects of any removal accordingly.
33.16	Table 4.3	Proposed surveys	Page 85 of the Scoping Report states that surveys are proposed for:

ID	Ref	Description	Inspectorate's comments
			<ul style="list-style-type: none"> • birds; • great crested newt; • bats; • otter; and • water vole. <p>The potential presence of other species is identified in the baseline section (pages 75-80), including rare and notable plant species brown hare and hedgehog. No further mention is made of these species. The ES should assess effects on these species, where significant effects are likely.</p>
33.17	n/a	Trees and woodlands	<p>Trees, hedgerows and woodlands within the application site should be mapped and their proposed losses should be quantified within the ES. Effects on this resource should be assessed where significant effects are likely.</p> <p>In particular, the Forestry Commission has noted the presence of a small area of lowland mixed deciduous woodland within the application site. The ES should assess the potential for the loss or fragmentation of, or damage to, this Priority Habitat.</p>
33.18	n/a	Nationally significant population of Crane	<p>Natural England has identified the known presence of a nationally significant population of Crane near the Proposed Development. The potential for impacts from bird strike and disturbance during construction and operation should be assessed in the ES, where significant effects are likely.</p>
33.19	n/a	Confidential Annexes	<p>Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other</p>

ID	Ref	Description	Inspectorate's comments
			assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Hydrology, Water Framework Directive and Flood Risk

(Scoping Report Table 4.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 4.4	Groundwater aquifers	Page 97 of the Scoping Report proposes to scope out groundwater aquifers due to the presence of unproductive superficial and bedrock strata which is of negligible sensitivity. The Inspectorate is content that this matter can be scoped out of further assessment.
34.2	Table 4.4	Grid connection and cable connection - impacts upon hydrology, hydrogeology, flood risk or WFD water bodies during operation	<p>The Scoping Report has not provided information to support its statement that "<i>the grid connection and cable connection is not considered to give rise to impacts upon hydrology, hydrogeology, flood risk or WFD water bodies</i>".</p> <p>The grid connection is located within areas of Flood Zones 2 and 3. The introduction of foundations and hardstanding for pylons and granular fills within cable trenches have the potential to impact upon flood storage and flood risk elsewhere. It could similarly impact upon surface water drainage and quality which are matters proposed to be scoped in on page 97. Similarly, it is not clear at this stage whether any watercourses would need to be crossed, and therefore potentially affected, by the cable connection (or grid connection should it not be an overhead line).</p> <p>The Inspectorate therefore does not agree this matter can be scoped out at this stage.</p>
34.3	Table 4.4	Decommissioning	The Scoping Report states that effects during the decommissioning phase will have a similar effect upon the water environment as construction. On the basis that likely significant effects have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of decommissioning. The ES should provide an assessment of decommissioning as well as further details on the specific mitigation measures required to avoid likely significant effects.

ID	Ref	Description	Inspectorate's comments
344	Para 2.5.6	Use of concrete ballast for photovoltaic (PV) panel foundations	The Scoping Report refers to the use of concrete ballast to avoid the requirement for ground penetration for mounting the PV panels. The ES should explain how this would be considered a viable option in a known area of Flood Risk Zones 2 and 3. The potential for damage to, or removal of, the ballast in a flood event should be considered as well as the potential for such infrastructure to increase flood risk elsewhere.
345	Figure 2.1	Baseline	Figure 2.1 identifies South Holland main drain and its catchment area. The legend shows a purple/grey colour for watercourses/drains and ponds, but none are identifiable on the figure. The location of watercourses should be clearly identifiable on figures within the ES.
346	Table 4.4	Water Framework Directive (WFD) Screening	<p>Page 91 of the Scoping Report states that there are four WFD waterbodies which have the potential to be impacted by the Proposed Development, however only two are screened in on page 92. No evidence is provided to support this matter.</p> <p>The Inspectorate considers that potential impacts on Vernatt's Drain and North Level Main Drain should be assessed, where significant effects are likely. Should they be screened out of the WFD assessment, the ES should present the evidence used to justify this approach, and demonstrate, where possible, consultation with the relevant statutory bodies.</p>
347	Table 4.4	Surface water abstractions	Page 92 of the Scoping Report identifies surface water abstractions within 1km of the application site. The proposed scope of assessment on page 94 does not consider these receptors. The Applicant should seek to agree relevant receptors with the Environment Agency and the ES should assess the potential impacts on these receptors from all phases of the Proposed Development, where significant effects are likely.

3.5 Agriculture and Soils

(Scoping Report Table 4.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
351	Table 4.5	Groundwater	Page 100 of the Scoping Report proposes to scope out groundwater as an environmental receptor due to the presence of unproductive superficial and bedrock strata which is of negligible sensitivity. The Inspectorate is content that this matter can be scoped out of further assessment.
352	Table 4.5	Soil resources	<p>Page 104 of the Scoping Report proposes to scope out soil resources, Although the Inspectorate notes the proposal for a SMP to be produced, it does not agree this matter can be scoped out of further assessment as page 102 states that there is the potential for impacts on drainage capabilities and restricted rooting for vegetation. It also identifies a potential significant effect due to the large scale of the Proposed Development. Furthermore, page 101 details how an assessment of effects on soil resources would be undertaken.</p> <p>The potential impacts on soil resources, including in respect of food production, water storage and flood mitigation, should be assessed within the ES.</p>
353	Table 4.5	Geodiversity (Cowbit Wash SSSI)	On the basis that the Scoping Report has not identified a likely linkage which may result in impacts to this site, the Inspectorate is in agreement that an assessment of effects on the Cowbit Wash SSSI and geodiversity can be scoped out of further assessment.
354	Table 4.5	Contaminated land	The Scoping Report states that a desk study has identified limited issues related to contaminated land which could be controlled (by health and safety measures) if encountered at the construction phase. However, possible sources of contamination have been identified through the desk study and site walkover/further investigations have yet to be undertaken. In addition, the baseline presented at this stage appears to relate only to the PV area. In the absence of a full Preliminary Risk Assessment

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			(PRA), the Inspectorate does not agree that contaminated land can be scoped out of further assessment at this stage. The ES should be supported by the findings of a PRA and where land contamination is identified, the ES should assess significant effects where they are likely to occur.

ID	Ref	Description	Inspectorate's comments
355	Table 4.5	Baseline information	<p>Page 100 of the Scoping Report gives the initial findings of a reconnaissance survey which shows the land to be mainly of Subgrade 3a quality with areas of Grade 1, 2 and Subgrade 3b. However, the rest of the Scoping Report refers to the land as Grade 1 and 2.</p> <p>The Inspectorate acknowledges that further Agricultural Land Classification (ALC) surveys are proposed, however stresses the importance of ensuring that the ES is consistent in its presentation of the baseline data, in particular where published mapping has been superseded by site specific surveys.</p>
356	Table 4.5	ALC surveys	<p>Page 102 of the Scoping Report states that ALC surveys of the PV area were undertaken at a 'reconnaissance scale' of 1 point per 4 to 5ha. The Scoping Report proposes a more detailed survey will be undertaken with a density of 1 auger per 2ha, with infill points being surveyed where variation occurs, to confirm the land grade boundaries and identify soil and land types.</p> <p>Natural England advise infill points are surveyed at a full detailed level (1 auger per 1 ha plus representative pits). The Applicant should ensure that a sufficient number of auger locations are used across the site to accurately inform the assessment in line with relevant guidance and/or standards (e.g., Natural England Technical Information Note TIN049, 2012), or justify why its proposed approach is robust, seeking agreement from relevant statutory bodies.</p>

ID	Ref	Description	Inspectorate's comments
			Detailed ALC surveys should be undertaken for any permanent infrastructure (i.e. substations, BESS, cable routes, access tracks, planting mitigation areas and pylons) and should be used to inform the final design of the project, including micro-siting of infrastructure.
35.7	Table 4.5	BMV - baseline	<p>The Applicant's attention is drawn to the Written Ministerial Statement (UIN HCWS466) issued on 15th May 2024. The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided.</p> <p>Consideration should be given to the use of BMV land in the Applicant's discussion of alternatives (noted in Section 3.7 of the Scoping Report).</p>
35.8		BMV – operational and decommissioning phases	Page 103 of the Scoping Report considers the loss of BMV during the operational phase to be temporary. Given the design life of the Proposed Development is expected to be 40 years, care should be taken in the assessment not to underplay potential operational effects in this regard. In addition, consideration should be given as to whether there would be permanent, irreversible loss from any project elements. In particular, the Scoping Report states that off-site cabling would be left in-situ, therefore the feasibility for such land to return to agricultural use should be addressed within the assessment.
35.9	NA	Sterilisation of peat resources	The Scoping Report refers to the presence of peat in the wider area. The ES should confirm the presence or absence of peat within the application site itself. If present, the ES should assess the potential for the temporary or permanent sterilisation of peat resources and the potential for presence of ground gas resulting from this (or other superficial deposits containing organic matter), where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
35.10	NA	Sterilisation of mineral resources	The Scoping Report does not describe the baseline conditions in relation to the mineral resources within the site boundary. The ES should assess the potential for the temporary or permanent sterilisation of mineral resources, where significant effects are likely.

3.6 Landscape and Visual

(Scoping Report Table 4.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 4.6	Lighting assessment – construction and decommissioning	<p>Page 110 of the Scoping Report states that a lighting assessment will not be undertaken. No information on the lighting to be used or regarding the nature and location of sensitive receptors has been provided. Noting the rural, largely unlit environment in which the Proposed Development is located and the likely change from the current baseline, the Inspectorate does not agree to scope this matter out of the assessment at this stage.</p> <p>In addition, page 83 of the Scoping Report identifies the potential for disturbance to ecological features through light pollution during construction. In the absence of a lighting assessment, it is unclear how an assessment of such effects would be undertaken.</p> <p>Impacts on landscape and visual amenity resulting from the introduction of lighting during construction, operation and decommissioning which are likely to result in significant effects should be assessed in the ES, unless it is agreed with relevant consultation bodies that this matter can be scoped out. Any proposed mitigation measures should be described and secured through the DCO. The Assessment should cross refer to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage).</p>

ID	Ref	Description	Inspectorate's comments
362	Table 4.6	ZTV	The key to Figure 4.6.1 Draft ZTV states that buildings have been assumed as 8m high. Paragraphs 2.5.11 and 2.5.21 state that substation buildings would be up to 15m high. The ZTV should be based on the maximum parameters to be permitted

ID	Ref	Description	Inspectorate's comments
			by the DCO, including the overhead pylons, and should not take into account the screening effect of surface features such as trees.
363	Table 4.6	Receptors – road users	Page 107 of the Scoping Report identifies residents and recreational users as potential visual receptors. Potential impacts on road users should also be considered within the ES, where significant effects are likely.
364	Table 4.6	Assessment – operational phase	The assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1); Residual with planting established (10 to 15 years); and at the Decommissioning Phase.
365	Table 4.6	Photomontages	Page 107 of the Scoping Report states that the assessment will be “ <i>supported using viewpoints and associated photographs to illustrate and evaluate the Scheme’s effects at key sites</i> ”. The Applicant should seek to agree the number and location of viewpoints to be developed as photomontages with relevant consultation bodies. Photomontages should be produced in accordance with the Landscape Institute’s TGN 06/19 Visual Representation of Development Proposals and should illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years).
366	Table 4.6	Assessment methodology – landscape effects	The assessment methodology presented on pages 107 and 108 of the Scoping Report focuses on visual effects. Although the potential for landscape effects has been acknowledged, no detail has been provided regarding the methodology for the assessment of effects on landscape character. This should be detailed within the ES.
367	Table 4.6	Mitigation	Page 109 of the Scoping Report notes the intention to “ <i>seek to avoid or minimise any removal of any vegetation that is present in the landscape</i> ”. Should any particular pockets of existing vegetation be relied upon to screen the Proposed Development, the Inspectorate expects their retention to be demonstrably secured.

ID	Ref	Description	Inspectorate's comments
368	Table 4.6	Assumptions and limitations	Page 110 of the Scoping Report notes uncertainties at this stage including the layout, siting and heights of the solar PV modules, on-site substation(s), and associated structures. The Inspectorate acknowledges these are valid unknowns for the scoping stage, however as noted in Table 2.1 of this Opinion, sufficient detail should be determined for the application stage.
369	Table 4.6	Cumulative effects	The assessment of cumulative effects should distinguish between effect on overall landscape character (including for National Landscapes) and on visual impact/amenity generally as well as any other relevant impacts such as 'glint and glare'.

3.7 Noise and Vibration

(Scoping Report Table 4.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 4.7	Operational effects - ground-borne vibration	<p>The Applicant proposes to scope out this matter on the basis that no major vibration sources are envisaged to be introduced as part of the operation. Considering the nature of the Proposed Development during operation the Inspectorate is content to scope this matter out of further assessment.</p>
37.2	Table 4.7	Operational effects – noise associated with cable connections	<p>The Scoping Report states that the cabling associated with the cable connection and grid connection will not produce any significant operational noise emissions. Should the cables be buried, the Inspectorate considers that the ground will provide attenuation of effects and significant effects are unlikely; therefore this matter can be scoped out.</p> <p>However, the Scoping Report identifies the potential for 400kV overhead lines. At high voltages, there is a limited potential for noise emissions from conductors on overhead lines under certain meteorological conditions. The ES should consider the potential for significant noise effects from overhead lines, where cable routes are near residential receptors.</p>
37.3	Table 4.7	Operational effects – road traffic noise	<p>The Applicant proposes to scope out an assessment of noise associated with operational traffic on the basis that the Proposed Development would generate minimal traffic during operation (7 LDV and 7 HGV movements per day).</p> <p>On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES description of development should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
374	Table 4.7	Decommissioning effects – road traffic noise	<p>Page 117 of the Scoping Report states that the noise assessment presented for the construction phase will be considered representative (or an overestimate) of the decommissioning phase and does not propose a separate decommissioning assessment. On the basis that likely significant effects have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of decommissioning.</p> <p>The Applicant proposes to scope out the effects of road traffic noise during decommissioning (page 118), due to uncertainties in relation to future traffic flows and transport infrastructure. The Inspectorate acknowledges these potential limitations but does not agree that decommissioning can be excluded from the ES. The ES should provide information on the likely trip generation during decommissioning and confirm the assessment conclusions for the decommissioning phase, based on reasonable assumptions. Further details on the specific mitigation measures required to avoid likely significant effects should also be provided.</p>
375	Table 4.7	All phases – noise effects on ecological receptors	<p>The Applicant proposes to scope out the assessment of noise effects on ecological receptors from the Noise and Vibration ES aspect chapter. The assessments would instead be presented in the Ecology and Biodiversity ES aspect chapter. The Inspectorate is content with this approach but advises the Applicant to provide clear cross-referencing in the Noise and Vibration ES aspect chapter to where these assessments are located.</p>

ID	Ref	Description	Inspectorate's comments
376	Table 4.7	Study area	<p>A 300m study area is proposed for identifying receptors sensitive to noise and vibration impacts, and Figure 4.7.1 presents the identified nearest sensitive receptors. The ES should explain how the study area and sensitive receptors have been selected with reference to the extent of the likely impacts.</p>

ID	Ref	Description	Inspectorate's comments
			The Inspectorate notes that the construction access routes are not covered in the study area in Figure 4.7.1, although noise and vibration from construction related vehicle movements is scoped in on page 116. The ES should identify sensitive receptors for this activity and assess potential noise and vibration impacts on them, where significant effects are likely.
37.7	Table 4.7	Receptors	The ES should identify any cultural heritage receptors which could be impacted by noise and vibration from the Proposed Development and assess any likely significant effects on such receptors. Consideration should be given to receptors along the construction traffic access routes. This assessment could be presented either within the Traffic and Access chapter or the Cultural Heritage chapter of the ES.
37.8	Figure 4.7.2	Baseline Noise Survey	Figure 4.7.2 presents the preliminary baseline assessment locations. The ES should explain how the baseline noise monitoring locations were identified and determined to be representative, with reference to relevant information including noise modelling/ contour mapping. The location of monitoring locations should be depicted on a supporting plan.
37.9	Table 4.7	Operational effects	Page 116 of the Scoping Report states that operational effects are reversible long-term. The Inspectorate acknowledges that operational noise effects would cease upon decommissioning, however given the design life of the Proposed Development is expected to be 40 years, care should be taken in the assessment not to underplay potential operational effects in this regard.
37.10	Table 4.7	Working hours	Page 117 of the Scoping Report states that assessment will assume construction would be undertaken in standard core working hours. The ES should confirm the working hours and identify any need for works outside of these hours, including night-time working. Working hours should be consistent with those specified in the dDCO/CEMP.

ID	Ref	Description	Inspectorate's comments
			For the avoidance of doubt, the assessment of the operational phase should reflect the hours of operation of the Proposed Development (assumed by the Inspectorate to be 24 hours a day, 365 days a year).

3.8 Socioeconomics, Human Health and Land Use

(Scoping Report Table 4.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Table 4.8	<p>Access to:</p> <ul style="list-style-type: none"> • Housing; • Education; • Childcare; • Open and play space; • Healthcare; • Community and leisure facilities; and • Tourism and recreation. 	<p>On the basis that the Proposed Development is for electricity generation and will not result in a permanent increase in the local residential population, the Inspectorate agrees that permanent significant effects on access to housing, education, childcare and healthcare are unlikely. These matters can therefore be scoped out.</p> <p>Page 129 of the Scoping Report proposes to assess the impact of the Proposed Development on access to open space; therefore this matter cannot be scoped out.</p> <p>At this stage, no information has been provided regarding community and leisure facilities, or tourism and recreation facilities in proximity to the application site. The Inspectorate therefore considers it premature to scope out these matters as it is unknown if access to such facilities could be affected for example by construction traffic, or by nuisances such as noise or dust. Any likely significant effects should therefore be assessed.</p>

ID	Ref	Description	Inspectorate's comments
382	Tables 4.8.3 and 4.8.4	Receptor sensitivity and impact magnitude	<p>The definitions of receptor sensitivity and impact magnitude proposed for socio-economics have an element of subjectivity. The ES should justify the levels of sensitivity/ magnitude identified in the ES and the Applicant should seek to agree these with South Holland District Council and Lincolnshire County Council.</p> <p>Table 4.8.3 identifies three levels of sensitivity for socio-economic receptors; this differs from the five levels identified in the overarching methodology in Section 3.3 (which details how significance is determined using five levels of receptor</p>

ID	Ref	Description	Inspectorate's comments
			sensitivity). Similarly, Table 4.85 identifies four levels of sensitivity for human health receptors. The ES should detail how significance is to be determined for these aspects. For ease of understanding, a common approach across these aspects should be sought, given that they are to be assessed within a single ES chapter.
383	Table 4.8	Human health - assessment of non-residential receptors	Where relevant, the ES should assess impacts on non-residential receptors such as occupants of nearby dwellings, hotel, offices and shops in proximity to the Proposed Development (as identified in the Air Quality chapter). The Scoping Report does not specify whether these are to be included in respect of Human Health.

3.9 Traffic and Access

(Scoping Report Table 4.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Table 4.9	Operational phase assessment	<p>The Scoping Report estimates 7 LDV and 7 HGV movements per day during operation (page 144) which will not trigger the screening thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines – Environmental Assessment of Traffic and Movement (2023).</p> <p>On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES description of development should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.</p>
392	Table 4.9	Assessment of decommissioning traffic	<p>The Scoping Report states that effects during the decommissioning phase will be less than those during the construction phase and proposes to scope out this matter due to uncertainties in relation to future traffic flows. The Inspectorate acknowledges these potential limitations but does not agree that decommissioning can be excluded from the ES. The ES should provide information on the likely trip generation during decommissioning and confirm the assessment conclusions for the decommissioning phase, based on reasonable assumptions. Further details on the specific mitigation measures required to avoid likely significant effects should also be provided.</p>

ID	Ref	Description	Inspectorate's comments
393	Figure 2.8	Access routes	<p>Figure 2.8 depicts access routes to the PV areas. The access routes to the grid connection and construction compounds should be depicted in the ES, once determined.</p>

ID	Ref	Description	Inspectorate's comments
394	Table 4.9	Study area	The ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. A plan illustrating the extent of the study area, the expected route(s) of construction traffic and the anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES.
395	Table 4.9	Baseline conditions	The Scoping Report presents the baseline conditions for the PV area only. Page 132 states that the location of new access for the grid connection corridor will be subject to further assessment for access requirements. The baseline environment for the entire application site should be clearly described within the ES.
396	Table 4.9	Abnormal Indivisible Loads (AILs)	Page 135 of the Scoping Report states that where AILs are required, detailed swept path analysis will be undertaken with an AIL Transport Management Plan to be submitted in support of the DCO application. The impacts on safety from the delivery of AILs should be assessed within the ES where significant effects are likely to arise. Appropriate measures to ensure safe transportation of hazardous loads (if any) should be included within the AIL Transport Management Plan.
397	Table 4.9	Cumulative effects	Page 135 of the Scoping Report states that schemes that are in pre-application, or that do not have a planning determination, will not be included in the cumulative assessment. The Inspectorate does not agree with this approach. The assessment of cumulative effects should identify schemes for inclusion following the methodology set out in section 3.6 of the Scoping Report.
398	Table 4.9	Traffic survey	Page 136 of the Scoping Report states that traffic counts will be undertaken, if considered necessary. The ES should identify the locations of traffic count surveys, explain how these locations were selected and confirm precise details of when the counts were undertaken. Effort should be made to agree these details with relevant local highway authorities. To provide assurance that the assessment of likely significant effects is supported by a robust dataset, the ES should include a justification to support the extent of the survey effort, including why the traffic data

ID	Ref	Description	Inspectorate's comments
			collected is considered to represent the typical (neutral) flow conditions on the network.
399	Table 4.9	Public Rights of Way (PRoWs)	<p>The Scoping Report states that there are numerous PRoW passing through and in proximity to the site. Surveys should be undertaken to provide baseline data in relation to the use of the PRoWs affected by the Proposed Development and the ES should provide a figure clearly depicting the location of said PRoWs. The ES should assess impacts to PRoW and on walking, cycling and horse-riding receptors from the Proposed Development such as the need for temporary closures or diversions, where significant effects are likely to occur.</p> <p>Lincolnshire County Council has identified a number of walking, cycling and equestrian facilities. These should be identified in the ES and impacts on them assessed, where significant effects are likely.</p>

3.10 Air Quality

(Scoping Report Table 4.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.101	Table 4.9	Operational Phase – quantitative assessment	Based on the information given in the Scoping Report in relation to the nature of the Proposed Development, the Inspectorate is in agreement that an assessment of the emissions from the operational phase of the Proposed Development can be scoped out of further assessment.
3.102	Table 4.9	Operational phase – traffic emissions	On the basis of the anticipated vehicle movements given in the Scoping Report (7 LDV and 7 HGV movements per day), the Inspectorate is in agreement that an assessment of the emissions from operational traffic can be scoped out of further assessment. However, the ES description of development should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.
3.103	Table 4.9	Decommissioning phase – road traffic emissions	<p>The Scoping Report states that effects during the decommissioning phase will be similar to or less than those during the construction phase and proposes to scope out this matter due to uncertainties in relation to future traffic flows. On the basis that likely significant effects have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of decommissioning.</p> <p>The Inspectorate acknowledges these potential limitations but does not agree that decommissioning can be excluded from the ES. The ES should provide information on the likely trip generation during decommissioning and confirm the assessment conclusions for the decommissioning phase, based on reasonable assumptions. Further details on the specific mitigation measures required to avoid likely significant effects should also be provided.</p>

ID	Ref	Description	Inspectorate's comments
3.104	Table 4.9	Identification of sensitive receptors	<p>The Scoping Report states that members of the public would be sensitive receptors in “<i>areas where members of the public may be exposed for one hour or longer in proximity to roads carrying traffic travelling to and from the Site</i>“. No source is given for this one-hour figure.</p> <p>Where the Applicant seeks to use guidance or threshold criteria to define receptor sensitivity (or the significance of effects), the source should be clearly referenced.</p>
3.105	Table 4.9	Sensitive ecological sites	<p>The Scoping Report states that there are no sensitive ecological sites with 200m of the site. The ES should confirm whether there are any ecological sites within 200m of the affected road network when identified and assess any likely significant effects from construction traffic emissions.</p>
3.106	Table 4.9	Determination of baseline	<p>Page 142 of the Scoping Report proposes to characterise baseline ambient air quality by way of a desk study. Page 140 states that the nearest local authority monitoring site is approximately 2km south of the application site. The Applicant should ensure that the baseline can be adequately characterised through a desk study and effort should be made to reach agreement with relevant consultation bodies, including the local authorities, as to whether any additional survey or monitoring work is required.</p>
3.107	Table 4.9	Mitigation	<p>Page 144 of the Scoping Report states that ‘high-level recommendations’ for mitigation will be provided. All measures relied upon to mitigate significant effects should be clearly described and secured within the dDCO.</p>
3.108	Table 4.9	Use of quantitative or qualitative assessment of construction emissions	<p>Pages 142-143 of the Scoping Report states that a series of criteria will be used to determine whether a quantitative or qualitative assessment of construction traffic emissions will be required. However, in the concluding section on page 144, the Scoping Report states that it will be qualitative.</p> <p>Where criteria are used to determine the methodology undertaken, a full explanation and justification should be given in the ES.</p>

3.11 Glint and Glare

(Scoping Report Table 4.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 4.10	Assessment of glint and glare effects on rail infrastructure, local roads, and PRowS during operational phase	<p>Page 149 of the Scoping Report states that there are no rail receptors located within 500m of the application site. The Inspectorate agrees that significant effects are not likely and that impacts from glint and glare on rail receptors can be scoped out of further assessment.</p> <p>Numerous local roads are present in proximity to the PV area (as visible on Figure 1.1). Table 4.9 states that a number of PRowS are adjacent to the PV area, and that several PRowS designated as Bridleways pass through the PVA area or run adjacent to it. Table 4.10 does not explain why the sensitivity of PRow users would be low and insufficient justification has been provided to demonstrate that the magnitude of impact of solar reflections on these receptors would always be considered low/minor. On this basis the Inspectorate does not agree to scope this matter out at this stage; the ES should provide an assessment of likely significant effects on users of local roads and PRowS during the operational phase.</p>
3.11.2	Table 4.10	Assessment of glint and glare effects during construction and decommissioning phases	On the basis that the construction and decommissioning phases are unlikely to result in glint and glare effects greater than those of the operational phase, the Inspectorate agrees that this matter can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.11.3	Table 4.10	Study area and sensitive receptors	Page 146 of the Scoping Report states that a 1km study area would be applied to identify light sensitive receptors including residential dwellings and national and regional roads. The Inspectorate notes that the draft ZTV proposed in Table 4.6 extends up to 5km from the application site. The Applicant is advised to use this

ID	Ref	Description	Inspectorate's comments
			ZTV to identify ground-based sensitive receptors with potential views of the site, which may be affected by glint and glare. This should also include local roads and PRowS, where significant effects are likely to occur. The ES should justify the choice of study area and sensitive receptors with reference to the extent of the likely impacts. Effort should be made to agree these details with relevant consultation bodies.
3.11.4	Table 4.10	Mitigation measures	The Scoping Report states that where glare impacts are predicted toward ground-based receptors, appropriate mitigation may include the installation of screening around the site perimeter to obstruct line of sight to solar PV panels (page 149). If this screening is to be provided in the form of landscaping, the ES should assess the short to medium term effects of glint and glare from the Proposed Development prior to the establishment of such mitigation. All landscaping should be detailed in the ES and provided within the Outline LEMP.

3.12 Major Accidents and Disasters

(Scoping Report Table 4.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Table 4.11	Events that could not realistically occur, due to the nature and location of the Proposed Development	The Scoping Report proposes to scope out events which are not realistically going to affect the Proposed Development, such as volcanic activity. The Inspectorate agrees that volcanic activity can be scoped out. The ES should include assessment of events that could potentially occur.

ID	Ref	Description	Inspectorate's comments
3.122	N/A	Assessment methodology	The Scoping Report states that a qualitative assessment of potential risk events will be carried out using professional judgement. The ES should contain clear explanations to justify the conclusions reached within the ES.

3.13 Environmental aspects proposed to be scoped out

(Scoping Report Table 4.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.131	Table 4.12	Telecommunications and utilities	The Inspectorate is content to scope this matter out provided that the ES sets out the findings of the desk-based assessment and how this has been taken into account in the design to mitigate impacts.
3.132	Table 4.12	Waste	<p>The Scoping Report proposes to scope out waste in its entirety.</p> <p>The Inspectorate notes the proposal for the ES to outline potential streams of construction waste and estimate volumes. The Scoping Report confirms that the waste hierarchy will be followed and the ES will outline measures to be implemented to minimise waste and a SWMP is proposed to manage waste. An Outline Decommissioning Plan will also be submitted as part of the ES.</p> <p>However, the Inspectorate notes that excavations may be required for jointing pits and pylon bases during construction, and that component replacement may be necessary during operation. In the absence of information demonstrating the quantities and types of waste anticipated, and the dependence on mitigation measures which are yet to be provided in the CEMP/ Outline Decommissioning Plan, the Inspectorate does not agree to scope this matter out of further assessment. The ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced during the construction and operation phases in line with Schedule 4 of the EIA Regulations. The ES should include an assessment of likely significant effects arising from the transportation and disposal of waste.</p> <p>The Scoping Report states that infrastructure would be recycled 'where possible' at decommissioning. The ES should outline what measures, if any, are in place to ensure that components (e.g. from batteries and / or panels) are able to be diverted from the waste chain and disposed of safely given that some types of solar panels</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>can contain hazardous materials. The ES should assess the likely significant effects from waste at decommissioning to the extent possible at this time. The ES should also consider the requirement for cumulative impacts to be assessed at decommissioning due to a number of solar farms in the local area also likely to be decommissioning in a similar timescale.</p>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	The Moultons Parish Council
	Holbeach Parish Council
	Crowland Parish Council
	Fleet Parish Council
	Weston Parish Council
	Whaplode Parish Council
	Cowbit Parish Council
	Deeping St. James Parish Council
	Gedney Parish Council
	Deeping St. Nicholas Parish Council
	Pinchbeck Parish Council
	Gedney Hill Parish Council
	Surfleet Parish Council
	Kirton Parish Council
	Algarkirk Parish Council
Fosdyke Parish Council	
Thorney Parish Council	
Newborough and Borough Fen Parish Council	
The Environment Agency	The Environment Agency

SCHEDULE 1 DESCRIPTION	ORGANISATION
Natural England	Natural England
The Forestry Commission	East and East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	North Level Internal Drainage Board
	South Holland Internal Drainage Board
	Welland and Deepings Internal Drainage Board
The relevant Highways Authority	Lincolnshire County Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory Undertaker’ is defined in the APFP Regulations (as amended) as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Lincolnshire
The relevant ambulance service	East Midlands Ambulance Service (NHS Trust)
The relevant fire and rescue authority	Lincolnshire

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Lincolnshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance Service (NHS Trust)
Railways	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
Indigo Pipelines Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Aidien Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Squire Energy Metering Ltd
	The Electricity Network Company Limited
UK Power Distribution Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Fenland District Council
South Holland District Council
Boston District Council
North Kesteven District Council
King's Lynn and West Norfolk District Council
South Kesteven District Council
Peterborough City Council
North Northamptonshire Council
North East Lincolnshire Council
North Lincolnshire
Rutland County Council
Cambridgeshire County Council
Norfolk County Council
Nottinghamshire County Council
Leicestershire County Council
Lincolnshire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Boston Borough Council
Cowbit Parish Council
Crowland Parish Council
Deeping St James Parish Council
Deeping St Nicholas Parish Council
Fenland District Council
Forestry Commission
Fulcrum Pipelines Limited
Gedney Hill Parish Council
Health and Safety Executive
Historic England
King's Lynn and West Norfolk District Council
Lincolnshire County Council
Lincolnshire Integrated Care Board
Moulton Parish Council
National Gas
National Grid Electricity Transmissions
Natural England
North East Lincolnshire Council
North Kesteven District Council
North Lincolnshire Council

South Holland District Council
South Holland Internal Drainage Board
UK Health Security Agency



Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

By Email: Planning Inspectorate
meridiansolar@planninginspectorate.gov.uk

www.anglianwater.co.uk

Our ref: MeridianSolar/ ScopingResponse

28th June 2024

Dear Sir/ Madam,

Application by Meridian Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the Meridian Solar Farm (the Proposed Development)- Anglian Water EIA scoping consultation response.

Thank you for the opportunity to comment on the scoping report for the above project which would be within the South Holland District of Lincolnshire. The project is one of several NSIP solar projects in and around Lincolnshire that Anglian Water has been consulted on by the Planning Inspectorate (PINS). Anglian Water is the appointed water undertaker and sewerage undertaker for the area.

The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to potable water and water assets along with wastewater and water recycling assets.

The Scheme – Anglian Water Existing Infrastructure

Anglian Water works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect that the Environmental Statement would include reference to any existing infrastructure managed by Anglian Water and the provision of replacement infrastructure and the requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure is planned to be undertaken with the minimum of disruption to the project and customers.

Given the potential location and likely extent of the proposed development area, there could be existing Anglian Water assets both above and below ground, which serve the surrounding businesses and community. For example, 1) there are existing Anglian Water assets including several water mains within the project area such as within the highway or its verges which link to the various settlements. 2) Within the proposed grid connection corridor there are two water recycling centres (sewage treatment works) located near to the villages of Moulton Chapel and

Moulton, with pipe connections to these settlements, including sewers and rising mains which are located in areas beyond the highway verges.

Utilities searches should, therefore, be undertaken to establish the extent of Anglian Water's assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets.

Maps of Anglian Water's underground assets are available to view at the following link:

<http://www.digdat.co.uk/>

For land investigation questionnaires relating to Anglian Water's above ground assets and formal easements, you should contact Anglian Water's estates team on: awsestates@savills.com

Anglian Water would want to ensure the location and nature of these assets is identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to all supporting infrastructure.

Anglian Water's preference is to work with the applicant during the pre-application phase to reach agreement on design changes, mitigation and protection measures in the application prior to submission. We would welcome on-going engagement to ensure that Anglian Water and the project have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination.

Scheme assessment, design, mitigation and connections

Anglian Water notes the absence of any reference to Anglian Water in the Scoping Report in terms of:

- Whether the management of surface water will require a public sewer connection.
- If water recycling/sewerage services are required for the construction or operation of the scheme.
- If a water supply is required for the construction and operation of the scheme.

Water Resources and Water Supply

In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply and water resources. Anglian Water requests that these points are assessed early in the EIA to set out how the project will be supplied with water, its wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets.

Anglian Water does not consider that sufficient information has been provided to reach a conclusion on the project impacts regarding water supply. Impacts of climate change in terms

of water availability for the construction, operation and decommissioning stages are also of relevance. Anglian Water requests that these points are covered in the EIA.

Anglian Water now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth. The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. To support appropriate water resource planning, Anglian Water now requires that significant new non-domestic water demands be set out in a Water Resources Assessment (WRA). For applications under the 2008 Act the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

Further advice on water capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at: planningliaison@anglianwater.co.uk

Flood Risk, Drainage and Surface drainage

Anglian Water welcomes that the surface water drainage has been scoped into the EIA (at paras 2.5.33 and 2.5.34). We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, Anglian Water would welcome clarification that the use of and consequent impacts on the local drainage/ sewerage network will be designed out of the scheme given that there will be no mains foul connection and SuDS will be used for both construction and operational stages.

Construction Environment Management Plan (CEMP)

We welcome the intention (at paras 2.7.12 – 2.7.15) to produce a CEMP. This should include steps to remove the risk of damage to Anglian Water assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. Further advice on minimising and then relocating (where feasible) Anglian Water existing assets can be obtained from: connections@anglianwater.co.uk


Engagement, the draft DCO Order and assisting the applicant

We would consider that Anglian Water should be included on the list of consultees to be drawn up by the applicant to follow their proposed approach to assessment and consultation as set out in Sections 1.3 and 1.4 of the Scoping Report.

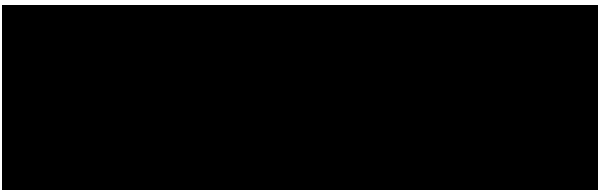
Anglian Water would welcome the instigation of discussions with the Applicant prior to the project layout and initial design fix for arrays and grid connection infrastructure and to assist the applicant before the submission of the Draft DCO for examination.

We would recommend discussion on the following issues:

1. The Draft Development Consent Order (DCO), including Protective Provisions specifically to ensure Anglian Water's services are maintained during construction.
2. Requirement for potable and raw water supplies.
3. Requirement for wastewater services.
4. Impact of development on Anglian Water's assets and the need for mitigation.
5. The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
6. Pre-construction surveys.

Advice on the form and content of suitable Protective Provisions in the draft DCO should be sought and a template copy is available. Please do not hesitate to contact Carry Murphy  [@anglianwater.co.uk](mailto:carry.murphy@anglianwater.co.uk) on this or should you require any clarification on the above response or during the pre-application to decision stages of the project.

Yours faithfully,



Phil Jones
Growth Strategy Manager – Sustainable Growth

c.c. enquiries@meridiansolar.co.uk



B O S T O N

BOROUGH COUNCIL

Municipal Buildings, West Street, Boston, Lincolnshire, PE21 8QR

Application No: B/24/0230
Case Officer: Lewis Humphreys

E-mail: planning@boston.gov.uk
Tel: 01205 314305

28 June 2024

Hannah Terry,
Planning Inspectorate
Environmental Services, Operations Group 3, Temple Quay House
2 The Square
Bristol
BS1 6PN

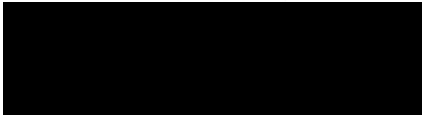
Dear Hannah Terry,

Scoping opinion under Regulations 10 and 11 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 with respect to an Order granting Development Consent for the Meridian Solar Farm at Meridian Solar Farm Ltd

I refer to your letter regarding the above development received on 31-May-2024.

I write to confirm that it is Boston Borough Council's view the conclusions of the Scoping Report are sound and have no further comments to make at this time.

Yours sincerely


Phil Norman
Assistant Director
Planning and Strategic Infrastructure
(Chief Planning Officer)
South & East Lincolnshire Councils Partnership

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From: [REDACTED]
To: [Meridian Solar Farm](#)
Subject: Re: Scoping Opinion Report - Meridian Solar Farm Ltd
Date: 26 June 2024 15:55:40

Our response to Meridian Solar's EIA Scoping Report has been organised within the categories used in the Scoping Report. However, it should be stated at the outset that we are against this development, both in terms of the scale of the development and industrialisation of what is a predominantly rural area. Public responses have been overwhelmingly negative and there is widespread concern in the local community with respect to visual changes to the countryside, impact on local roads, especially during construction and resident mental health.

We feel these large-scale developments are also reducing the options for smaller scale rooftop solar. We are certainly aware that some of these projects have not been able to go ahead as all the potential grid connections have been bought up by potential projects such as Meridian Solar. This delays the ability of many smaller scale producers who propose to produce electricity in a smaller, less impactful way.

We feel the report does not adequately compare the economic benefits of the solar farm with the potential economic costs, such as loss of agricultural land and increased road maintenance and suggest Meridian provide a detailed cost-benefit analysis comparing the economic benefits of the solar farm with potential economic costs. Include considerations of lost agricultural productivity, potential decrease in tourism, and increased maintenance costs for local infrastructure.

With respect to the specific areas the report addresses

Climate Change

We would refute the fact that solar panels offer a huge benefit to overcoming climate change. The report lacks detailed analysis for the long term sustainability of the Meridian Solar Project. Solar panels are produced in China using rare earth minerals mined in Africa, producing a high carbon footprint before they arrive in the UK, this together with their low productivity in a UK climate does not outweigh the positive environmental benefit of agriculture to fixing carbon and negative impact on the environment and human mental and physical health. Some of the farms currently grow maize to feed a nearby anaerobic digester (AD). The yield of electricity from AD is 30 MW per hectare which compares very favourably with published figures for solar farms which produce only 0.5 MW per hectare. Yields of maize, as a C4 species are likely to increase in the future in relation to global warming and in relation to potential adoption of genetically modified varieties in the UK in future. To radically change the countryside into an industrial landscape when current renewables are producing 60 times the electricity output per unit area seems ridiculous considering the huge capital outlay, extensive greenhouse gas production during construction and decommissioning and disruption to the community; this in addition to the use of large scale battery storage which poses a fire risk and is an eyesore to the environment.

Most farms are currently carbon neutral, but regenerative farming practices such as direct drilling, strip tillage and the use of inter row clovers to reduce carbon loss and the use of artificial fertilisers are all used at least one of the farms in the area where maize for AD production is currently grown (Block D - Langary Gate Road). Together with the current AD produced electricity, these farms are currently carbon positive, a state that is unlikely to continue under the current proposal.

Cultural Heritage

South Holland has its own unique character, having been drained by Dutch engineers. This character is unique and should not be destroyed by industrial development. There is also concern that the project will disrupt the cultural heritage of the Meridian Stone on Langary Gate Road and feel protective measures should be taken to ensure this and the surrounding area remains unaffected. Additionally there is the site of the WW2 Dornier crash site which should be preserved.

We feel there should be an evaluation of the cumulative impact of renewable energy measures in the area and a proposal of mitigation strategies to preserve this heritage. Ecology and Biodiversity.

We refute the argument that biodiversity net gain will be enhanced. Likely vegetative growth beneath solar panels is likely to be of minimal quality and diversity. Where is the promised 10% increase in biodiversity and what form will this take? The change in the landscape will impact species diversity. The area produces a diverse opportunity for wildlife proliferation.

Meridian Solar's report details 9 schedule 1 breeding species, 13 red list birds of conservation concern and 11 species of principal importance. There are 12 Lincolnshire biodiversity action plan species, including wintering and breeding species, including the presence of 3 declining farmland species. Skylarks, which are 'RED' listed are numerous across the site, with 95 skylark territories within the area, and although they will feed near solar farms, require open countryside to nest in. These birds cannot relocate as the surrounding area is likely to be populated to capacity and the local population would be decimated.

We have a large population of deer, mainly roe, one of our few native species. During the winter, these can be seen in large groups moving across the proposed area. There is little detail of wildlife corridor movements from the initial environmental assessments, and these should be done in detail to minimise the impact of large and small mammal movement across the area, e.g. between woods and along hedgerows and watercourses. Bats and brown hares have been widely reported by local residents, neither of which appear in the Meridian Solar Scoping Report. Meridian have scoped out the impact on badgers which have been identified as residing in the proposed solar farm. We feel these should be scoped in as they are a protected species under the Protection of Badgers Act 1992.

In the short term, two years of construction work would be catastrophic for the local wildlife population and wildlife would be displaced during this period, unlikely to return once much of the development is fenced since this will reduce wildlife highways. The fencing should certainly be addressed in detail as this is an aspect that concerns many residents.

We are also concerned that construction work would continue throughout the breeding season, despite the presence of Schedule 1 and Red listed breeding species across the whole area and that provision will not be made for wintering species. Statements of light and noise pollution during the operational stage, will cause disruption for both wildlife, ecology and the community. We therefore propose that an assessment of light pollution should be done, particularly in respect to wildlife and local residents. A further disruption will occur during decommissioning, reducing populations further should they have managed to survive or re-establish. In fact, it is shocking to read that no habitat construction will begin ahead of development, allowing wildlife to have areas to relocate to. In fact, habitat construction is only planned post construction.

A couple of surveys on winter birds and spring wildlife in a very unusual season, does not provide adequate understanding of the biodiversity and we feel additional surveys during different seasons plus proposing specific mitigation measures such as wildlife corridors and habitat enhancement plans are warranted. We understand that this is an early report, but there seems to be no forward planning to mitigate effects on wildlife, one of the major areas to be disrupted by the proposed development.

Hydrology and Flood risk

We are concerned there is insufficient analysis of potential flood risks in areas like Gedney Hill and Fleet Fen. We suggest Meridian Solar conduct detailed hydrological studies and incorporate robust flood mitigation strategies such as sustainable drainage systems (SuDS).

Agriculture and Soils

Agricultural land classification map shows the soils to be Grade 1 and 2, of excellent (darker blue) and very good (lighter blue) quality as shown in the map below. Compared to most soils in the East Midlands area, these soils are of superior quality and the best in much of the country (the green and yellow areas on the map below). The National Policy Statement, recently reinforced by the ministerial statement, makes clear that poorer quality land is to be preferred for solar farm development and the impact on best and most versatile land (BMV) land should be minimised. It is also a material consideration under the Town and Country Planning Act 1990 and a relevant consideration for Nationally Significant Infrastructure Projects.

The area is well drained, being below sea level and under the jurisdiction of the North Level Internal Drainage Board. Although reports conducted by Meridian Solar have down-classed this land to Grades 1, 2 and 3a with statements to the effect 'The land is primarily limited by wetness and workability constraints', this assessment has been conducted during one of the wettest periods in living memory with rainfall amounts in autumn and winter being over 170% of average (Met Office 1991-2020 anomaly data). Any reclassification of silty, clay soils under these conditions is likely to downgrade the soil due to drainage issues. Any normal drainage has not been able to cope with autumn and winter rainfall levels, whilst much of the country has been waterlogged. Food security is increasingly important to the UK, but we are less than 50% self-sufficient, thus even a small (quoted less than 1%) reduction of agricultural land is not warranted when alternative options exist for solar electricity production e.g. roof tops. These smaller scale solar schemes produce energy where it is needed, thus reducing the need for large scale expansion of the national grid and further destruction of the countryside. As the recent war in Ukraine has outlined the necessity and benefits of better food security, any future defence strategies should include these as an important consideration.

Exit strategies that would return the land to agricultural use would cause massive destruction of soil quality and structure which may take many years to recover, added to the fact that soil health is dependant on growing diverse and large amounts of green cover, something unlikely to be achieved under solar panels where light is limited and generally only poor quality couch grasses survive.

Soil Classification in the local area and relative to the East Midlands area showing the scarcity of Grade 1 and 2 soils (Natural England ALC)

Landscape and Visual

The size and scale of the proposal is not warranted or sustainable. It is 10 times larger than any existing solar farm and together with other potential local solar farm

developments at Sutton St Edmund, Sutton St James and Thorney to name a few within a 5 mile radius, alongside multiple proposals concentrated in Lincolnshire, plus the proposed overhead lines to the National Grid Substation at Weston, and the current wind farms already present in the area, these industrial infrastructures would have a massive impact on the local community and landscape.

The area is described as a large, low lying flat landscape with drainage ditches, dykes and rivers with huge skies meeting the horizon. There are few woods and hedges providing far reaching views over the countryside, which is naturally green, peaceful and beautiful. This industrial development is totally alien to the area and would be seen for many miles.

Walkways across the area are generally confined to raised banks along water courses and drainage ditches, thus providing an elevated view of the landscape which would be ruined by vast areas of glass solar panels. Some properties will be surrounded by panels on all sides which is completely unacceptable.

Meridian Solar is not proposing to undertake a Residential Visual Amenity Assessment (p108). This must be done as the development will be visible for miles due to the flat landscape and will adversely affect many residents. Additionally, there is no detail at all of visual screening measures to be taken, however we feel this should be addressed, as well as due consideration of alternative layouts to minimise intrusion from key viewpoints, public spaces and close residents. Screening in the form of trees and hedges should begin well before construction, to allow time for vegetation to grow to the proposed height of 3 metres to effectively screen the installations.

Noise and Vibration

The area is naturally very quiet and peaceful with little or no noise for most of the day. Any noise is limited to agricultural machinery which operates only occasionally at certain times of the year. Any increase in noise levels would negate quality of life for residents and affect wildlife.

The roads are also generally quiet with little or no traffic for most of the day. Any increase in traffic is noticeable, especially that of heavy vehicles. In addition, any increase in vehicle numbers, however small, represents a large percentage increase in the noise level to the community. Similarly, construction, pile driving and a general increase in people in the area are likely to impact noise.

Socio Economics, Human Health and Land Use

All aspects of socio economics and human health should be assessed. Initial meetings with the community have already produced a high degree of upset, anxiety and fear of the proposal. Almost no support for this project exists within the community, apart from the four landowners who will profit from this scheme. We feel a thorough assessment of potential mental health impacts should be undertaken and Meridian Solar should implement measures such as providing mental health support services and clear communication about project timelines.

Effects on human health via increased construction traffic, noise, visual impacts, wildlife disruption etc should not be underestimated. Most residents in the area value peace and quiet highly, hence choosing the area to reside in.

Also relevant is the loss to the local economy. South Holland District Council website states that nearly 35% of the UK's food will go through South Holland at some point in its life. Agriculture and its related industries make up 99% of the total business count in

the area. These farms support not only agricultural food production but also grow maize for anaerobic digestion, supporting local industries in Crowland and producing electricity in a much more efficient and environmental way than solar.

As there is no specific outline of socio economic benefits to the community within the Scoping Report, these should be addressed in more detail. Rural communities should not disproportionately bear the environmental and social burdens of large infrastructure projects that primarily benefit urban areas or large corporations. Additionally, there is little detail of community benefits. We feel Meridian Solar should emphasise the principles of environmental and social justice, ensuring that the local community's needs and well-being are prioritised in the decision-making processes, something most residents feel is not being done at present; rather lip service is being paid to consultation, but this will have little effect on project decisions.

Traffic and access

Many of the roads designated as transport links are narrow, single carriageway roads unsuitable for heavy machinery. Road condition is generally poor with many potholes, soft grass verges and shifting road surfaces. The area is subject to subsidence and roads commonly break. Due to uneven road surfaces, vehicle damage is common, both to vehicle suspension and vehicles running into ditches and drainage systems. The narrow lanes outlined as transport routes are often bounded by deep drainage ditches which make the construction of passing places impossible. Additionally heavy traffic can cause damage to drainage channels, leading to flooding and disruption of the Internal Drainage Boards' work. Hulls Drove, which is a main route to Holbeach and Gedney Hill and beyond, has been subject to numerous closures for major repairs in the last couple of years which have only lasted a few months. Similarly, the A16 Crowland bypass is of poor quality, despite only being a recent addition to the area. Some of the minor roads suggested as transport routes such as Langary Gate Road and Queens Drove currently receive very little traffic, often only a hundred or so vehicles a day, thus the peace and quiet of these rural backwaters will be lost. An assessment of traffic flow and numbers should be conducted to fully assess the impact of extra traffic on the road system. Additionally, traffic management plans should be produced, plus a plan for road maintenance and repairs of damage incurred by heavy machinery and extra traffic flows.

Air Quality

Environmental warming is a common effect of large-scale solar farms, similar to heat hazes in cities. Similarly, the effect of construction traffic for a prolonged period is likely to influence air quality in a rural area.

Glint and Glare

Because the minor roads are so quiet, they are regularly used by cyclists, walkers, horse riders etc. There are few pedestrian pathways or pavements, thus any suggestion of passing places is likely to affect pedestrian traffic and human safety.

There is also concern that the project is very close to Crowland Glider Club and Fenland Airfield, as well as being used regularly as a flight path by Lincolnshire RAF air bases, thus Glint and Glare Assessments should be conducted from an aerial viewpoint as well as from the ground.

Major Accidents And Disasters

There is concern regarding increased traffic on the small local roads which generally have no pedestrian walkways. Traffic is generally very low, whilst livestock and wild animals, especially deer, often cause accidents since they either escape onto roads or cross without warning.

Fire risk is also a major concern particularly in Lincolnshire in the summer months, as the area is a purely arable landscape, not grassland. All it takes is a spark to generate a field fire. The combining and baling of combustible wheat and barley harvest crops, the inevitable giant straw stacks and questionable battery storage make a recipe for disaster. In addition, fire services locally, are generally on a retained basis and not always available at short notice. Arrival times may be delayed so responses to a fire would be slow, possibly leading to a major incident.

Traffic flow is highly likely to increase by more than 30% given the low level of traffic flow on these minor roads, certainly with up to 60 deliveries per day and 400 staff per day.

Kind regards

Angela Harrison

Clerk & RFO to Cowbit Parish Council

01733 210992

clerk.cowbit@gmail.com



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CROWLAND PARISH COUNCIL

Parish Rooms, Hall Street, Crowland, Peterborough, PE6 0EW

Tel: 01733 210653 | email: enquiries@crowland-pc.uk

Chairman: Bryan Alcock

Parish Clerk: Tina Croxford



Sent by email

13th June 2024

Dear Mr Chapman

EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

It is recognised that government policy is to move to renewable energy and secure power security but it should not be by concentrating development around a small community with no significant community gain, whilst considerable gain is enjoyed by the developer and land owners long term.

Historically South Holland and surrounding areas were the breadbasket of the UK. Food security is equally important with a growing national population and an uncertain world.

As indicated it is a significant development which will change the face of the Parish of Crowland.

Experience with other smaller similar proposals shows the landscape has changed with little benefit to the local population.

Previous applications for similar types of development have indicated the use would be for 30 years after which the land would revert to agriculture. That term has progressively moved to 40 years. However irrespective of the term it is highly unlikely that the site will revert with a more likely application for an extension or renewal as the power is likely to still be required. It would be more honest if that prospect was spelt out.

Equally, applicants claim the land will benefit from being taken out of cropping. No such proof has been forthcoming. Window dressing is also provided suggesting sheep will be grazed between the panels. Again, highly unlikely. It is not a livestock area and herding sheep around PV panels must be questionable. A more serious approach to cropping between the rows of PV panels should be examined, soft fruits or vegetables perhaps, as a conditional requirement.

In this instance, the sites are cheek by jowl with a Bio-diversity plant which itself has changed the landscape as well as cropping required to feed it with a significant area having moved to non-food production already.

Bio-diversity should not be merely to shield the development from view or only provide security around it but be ambitious and create significant long-term facilities with public access for the community to enjoy long term.

The proposed community benefit following the development is far from ambitious enough for a development of this size and nature. The community is in desperate need of a new community building and sport changing facilities. To demonstrate good faith and a commitment to the community provision of such a facility would enable the community to enjoy the benefit from the development at the same time that the developers are enjoying the financial return.

Roads which will need to be used during the development already are in need of repair and improvement. By necessity, the main access will be by using an acknowledged dangerous junction off the A16 onto B1166. In the interest of safety that junction should be converted into a roundabout prior to construction commencing.

It is appreciated that power will need to be transmitted a considerable distance and some pylons may be necessary. It is requested that at least the part within the parish of Crowland will be underground.

Yours sincerely

Bryan Alcock
Chairman of Crowland Parish Council

CC Sir J Hayes MP



DEEPING ST JAMES PARISH COUNCIL

The Institute, 38 Church Street, Deeping St James, Peterborough PE6 8HD

e-mail: clerk@deepingstjames-pc.gov.uk Tel: 01778 343266

Webpage: deeping-st-james.parish.lincolnshire.gov.uk

Parish Clerk: Julie Fortnum

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Friday 21 June 2024

Dear Sirs,

Reference: EN101069 Meridian Solar Farm - EIA Scoping Notification and Consultation / Reg 11 Notification

Deeping St James Parish Councillors viewed the documents shared by the Planning Inspectorate and considered that they would like to raise serious concerns that the scoping report does not cover. Councillors believe that there is a high priority to preserve high valuable arable land and our food security.

Yours faithfully.

Louise

Louise Brown
Assistant Clerk
Deeping St James Parish Council

From: [Deeping St Nicholas Parish Council](#)
To: [Meridian Solar Farm](#)
Subject: Re: Scoping Opinion Report - Meridian Solar Farm
Date: 26 June 2024 16:02:29

Our feedback on Meridian Solar's EIA Scoping Report is structured according to the categories outlined in the report itself. However, we must express our opposition to the project from the start, citing concerns over the scale of development and the industrialization of a largely rural area. The public response has been predominantly negative, with widespread concerns among the local community regarding the visual impact on the countryside, the effect on local roads—particularly during construction—and the implications for residents' mental health.

The advent of such large-scale developments appears to be curtailing opportunities for smaller rooftop solar initiatives. We have observed that potential grid connections are being monopolized by large projects like Meridian Solar, thereby hindering the progress of smaller producers who aim to generate electricity in a less intrusive manner.

We believe the report fails to provide a balanced comparison between the economic advantages of the solar farm and the potential economic drawbacks, such as the loss of agricultural land and the burden of increased road maintenance. We propose that Meridian Solar conduct a comprehensive cost-benefit analysis to weigh the economic gains of the solar farm against these potential costs, taking into account the loss of agricultural productivity, a possible decline in tourism, and the heightened maintenance expenses for local infrastructure.

Regarding the specific areas addressed in the report, particularly climate change, we challenge the assertion that solar panels significantly contribute to mitigating climate change. The report does not offer an in-depth analysis of the long-term sustainability of the Meridian Solar Project. Considering that solar panels are manufactured in China using rare earth minerals sourced from Africa, resulting in a substantial carbon footprint before even reaching the UK, and their relatively low efficiency in the UK's climate, we argue that these factors do not compensate for the purported environmental benefits of large-scale solar farming.

Our response to Meridian Solar's EIA Scoping Report has been organised within the categories used in the Scoping Report. However, it should be stated at the outset that we are against this development, both in terms of the scale of the development and industrialisation of what is a predominantly rural area. Public responses have been overwhelmingly negative and there is widespread concern in the local community with respect to visual changes to the countryside, impact on local roads, especially during construction and resident mental health.

We feel these large-scale developments are also reducing the options for smaller scale rooftop solar. We are certainly aware that some of these projects have not been able to go ahead as all the potential grid connections have been bought up by potential projects such as Meridian Solar. This delays the ability of many smaller scale producers who propose to produce electricity in a smaller, less impactful way.

We feel the report does not adequately compare the economic benefits of the solar farm with the potential economic costs, such as loss of agricultural land and increased road maintenance and suggest Meridian provide a detailed cost-benefit analysis comparing the economic benefits of the solar farm with potential economic costs. Include considerations of lost agricultural productivity, potential decrease in tourism,

and increased maintenance costs for local infrastructure.

With respect to the specific areas the report addresses

Climate Change

We would refute the fact that solar panels offer a huge benefit to overcoming climate change. The report lacks detailed analysis for the long term sustainability of the Meridian Solar Project. Solar panels are produced in China using rare earth minerals mined in Africa, producing a high carbon footprint before they arrive in the UK, this together with their low productivity in a UK climate does not outweigh the positive environmental benefit of agriculture to fixing carbon and negative impact on the environment and human mental and physical health. Some of the farms currently grow maize to feed a nearby anaerobic digester (AD). The yield of electricity from AD is 30 MW

per hectare which compares very favourably with published figures for solar farms which produce only 0.5 MW per hectare. Yields of maize, as a C4 species are likely to increase in the future in relation to global warming and in relation to potential adoption of genetically modified varieties in the UK in future. To radically change the countryside into an industrial landscape when current renewables are producing 60 times the electricity output per unit area seems ridiculous considering the huge capital outlay, extensive greenhouse gas production during construction and decommissioning and disruption to the community; this in addition to the use of large scale battery storage which poses a fire risk and is an eyesore to the environment.

Most farms are currently carbon neutral, but regenerative farming practices such as direct drilling, strip tillage and the use of inter row clovers to reduce carbon loss and the use of artificial fertilisers are all used at least one of the farms in the area where maize for AD production is currently grown (Block D - Langary Gate Road). Together with the current AD produced electricity, these farms are currently carbon positive, a state that is unlikely to continue under the current proposal.

Cultural Heritage

South Holland has its own unique character, having been drained by Dutch engineers. This character is unique and should not be destroyed by industrial development. There is also concern that the project will disrupt the cultural heritage of the Meridian Stone on Langary Gate Road and feel protective measures should be taken to ensure this and the surrounding area remains unaffected. Additionally there is the site of the WW2 Dornier crash site which should be preserved.

We feel there should be an evaluation of the cumulative impact of renewable energy measures in the area and a proposal of mitigation strategies to preserve this heritage. Ecology and Biodiversity.

We refute the argument that biodiversity net gain will be enhanced. Likely vegetative growth beneath solar panels is likely to be of minimal quality and diversity. Where is the promised 10% increase in biodiversity and what form will this take? The change in the landscape will impact species diversity. The area produces a diverse opportunity for wildlife proliferation.

Meridian Solar's report details 9 schedule 1 breeding species, 13 red list birds of conservation concern and 11 species of principal importance. There are 12 Lincolnshire biodiversity action plan species, including wintering and breeding species, including the presence of 3 declining farmland species. Skylarks, which are 'RED' listed are numerous across the site, with 95 skylark territories within the area, and although they will feed near solar farms, require open countryside to nest in. These birds cannot relocate as

the surrounding area is likely to be populated to capacity and the local population would be decimated.

We have a large population of deer, mainly roe, one of our few native species. During the winter, these can be seen in large groups moving across the proposed area. There is little detail of wildlife corridor movements from the initial environmental assessments, and these should be done in detail to minimise the impact of large and small mammal movement across the area, e.g. between woods and along hedgerows and watercourses. Bats and brown hares have been widely reported by local residents, neither of which appear in the Meridian Solar Scoping Report. Meridian have scoped out the impact on badgers which have been identified as residing in the proposed solar farm. We feel these should be scoped in as they are a protected species under the Protection of Badgers Act 1992.

In the short term, two years of construction work would be catastrophic for the local wildlife population and wildlife would be displaced during this period, unlikely to return once much of the development is fenced since this will reduce wildlife highways. The fencing should certainly be addressed in detail as this is an aspect that concerns many residents.

We are also concerned that construction work would continue throughout the breeding season, despite the presence of Schedule 1 and Red listed breeding species across the whole area and that provision will not be made for wintering species. Statements of light and noise pollution during the operational stage, will cause disruption for both wildlife, ecology and the community. We therefore propose that an assessment of light pollution should be done, particularly in respect to wildlife and local residents. A further disruption will occur during decommissioning, reducing populations further should they have managed to survive or re-establish. In fact, it is shocking to read that no habitat construction will begin ahead of development, allowing wildlife to have areas to relocate to. In fact, habitat construction is only planned post construction.

A couple of surveys on winter birds and spring wildlife in a very unusual season, does not provide adequate understanding of the biodiversity and we feel additional surveys during different seasons plus proposing specific mitigation measures such as wildlife corridors and habitat enhancement plans are warranted. We understand that this is an early report, but there seems to be no forward planning to mitigate effects on wildlife, one of the major areas to be disrupted by the proposed development.

Hydrology and Flood risk

We are concerned there is insufficient analysis of potential flood risks in areas like Gedney Hill and Fleet Fen. We suggest Meridian Solar conduct detailed hydrological studies and incorporate robust flood mitigation strategies such as sustainable drainage systems (SuDS).

Agriculture and Soils

Agricultural land classification map shows the soils to be Grade 1 and 2, of excellent (darker blue) and very good (lighter blue) quality as shown in the map below. Compared to most soils in the East Midlands area, these soils are of superior quality and the best in much of the country (the green and yellow areas on the map below). The National Policy Statement, recently reinforced by the ministerial statement, makes clear that poorer quality land is to be preferred for solar farm development and the impact on best and most versatile land (BMV) land should be minimised. It is also a material consideration under the Town and Country Planning Act 1990 and a relevant consideration for Nationally Significant Infrastructure Projects.

The area is well drained, being below sea level and under the jurisdiction of the North Level Internal Drainage Board. Although reports conducted by Meridian Solar have down-classed this land to Grades 1, 2 and 3a with statements to the effect 'The land is primarily limited by wetness and workability constraints', this assessment has been conducted during one of the wettest periods in living memory with rainfall amounts in autumn and winter being over 170% of average (Met Office 1991-2020 anomaly data). Any reclassification of silty, clay soils under these conditions is likely to downgrade the soil due to drainage issues. Any normal drainage has not been able to cope with autumn and winter rainfall levels, whilst much of the country has been waterlogged. Food security is increasingly important to the UK, but we are less than 50% self-sufficient, thus even a small (quoted less than 1%) reduction of agricultural land is not warranted when alternative options exist for solar electricity production e.g. roof tops. These smaller scale solar schemes produce energy where it is needed, thus reducing the need for large scale expansion of the national grid and further destruction of the countryside. As the recent war in Ukraine has outlined the necessity and benefits of better food security, any future defence strategies should include these as an important consideration.

Exit strategies that would return the land to agricultural use would cause massive destruction of soil quality and structure which may take many years to recover, added to the fact that soil health is dependant on growing diverse and large amounts of green cover, something unlikely to be achieved under solar panels where light is limited and generally only poor quality couch grasses survive.

Soil Classification in the local area and relative to the East Midlands area showing the scarcity of Grade 1 and 2 soils (Natural England ALC)

Landscape and Visual

The size and scale of the proposal is not warranted or sustainable. It is 10 times larger than any existing solar farm and together with other potential local solar farm developments at Sutton St Edmund, Sutton St James and Thorney to name a few within a 5 mile radius, alongside multiple proposals concentrated in Lincolnshire, plus the proposed overhead lines to the National Grid Substation at Weston, and the current wind farms already present in the area, these industrial infrastructures would have a massive impact on the local community and landscape.

The area is described as a large, low lying flat landscape with drainage ditches, dykes and rivers with huge skies meeting the horizon. There are few woods and hedges providing far reaching views over the countryside, which is naturally green, peaceful and beautiful. This industrial development is totally alien to the area and would be seen for many miles.

Walkways across the area are generally confined to raised banks along water courses and drainage ditches, thus providing an elevated view of the landscape which would be ruined by vast areas of glass solar panels. Some properties will be surrounded by panels on all sides which is completely unacceptable.

Meridian Solar is not proposing to undertake a Residential Visual Amenity Assessment (p108). This must be done as the development will be visible for miles due to the flat landscape and will adversely affect many residents. Additionally, there is no detail at all of visual screening measures to be taken, however we feel this should be addressed, as well as due consideration of alternative layouts to minimise intrusion from key viewpoints, public spaces and close residents. Screening in the form of trees and hedges should begin well before construction, to allow time for vegetation to grow to the

proposed height of 3 metres to effectively screen the installations.

Noise and Vibration

The area is naturally very quiet and peaceful with little or no noise for most of the day. Any noise is limited to agricultural machinery which operates only occasionally at certain times of the year. Any increase in noise levels would negate quality of life for residents and affect wildlife.

The roads are also generally quiet with little or no traffic for most of the day. Any increase in traffic is noticeable, especially that of heavy vehicles. In addition, any increase in vehicle numbers, however small, represents a large percentage increase in the noise level to the community. Similarly, construction, pile driving and a general increase in people in the area are likely to impact noise.

Socio Economics, Human Health and Land Use

All aspects of socio economics and human health should be assessed. Initial meetings with the community have already produced a high degree of upset, anxiety and fear of the proposal. Almost no support for this project exists within the community, apart from the four landowners who will profit from this scheme. We feel a thorough assessment of potential mental health impacts should be undertaken and Meridian Solar should implement measures such as providing mental health support services and clear communication about project timelines.

Effects on human health via increased construction traffic, noise, visual impacts, wildlife disruption etc should not be underestimated. Most residents in the area value peace and quiet highly, hence choosing the area to reside in.

Also relevant is the loss to the local economy. South Holland District Council website states that nearly 35% of the UK's food will go through South Holland at some point in its life. Agriculture and its related industries make up 99% of the total business count in the area. These farms support not only agricultural food production but also grow maize for anaerobic digestion, supporting local industries in Crowland and producing electricity in a much more efficient and environmental way than solar.

As there is no specific outline of socio economic benefits to the community within the Scoping Report, these should be addressed in more detail. Rural communities should not disproportionately bear the environmental and social burdens of large infrastructure projects that primarily benefit urban areas or large corporations. Additionally, there is little detail of community benefits. We feel Meridian Solar should emphasise the principles of environmental and social justice, ensuring that the local community's needs and well-being are prioritised in the decision-making processes, something most residents feel is not being done at present; rather lip service is being paid to consultation, but this will have little effect on project decisions.

Traffic and access

Many of the roads designated as transport links are narrow, single carriageway roads unsuitable for heavy machinery. Road condition is generally poor with many potholes, soft grass verges and shifting road surfaces. The area is subject to subsidence and roads commonly break. Due to uneven road surfaces, vehicle damage is common, both to vehicle suspension and vehicles running into ditches and drainage systems. The narrow lanes outlined as transport routes are often bounded by deep drainage ditches which make the construction of passing places impossible. Additionally heavy traffic can cause damage to drainage channels, leading to flooding and disruption of the Internal Drainage Boards' work. Hulls Drove, which is a main route to Holbeach and Gedney Hill

and beyond, has been subject to numerous closures for major repairs in the last couple of years which have only lasted a few months. Similarly, the A16 Crowland bypass is of poor quality, despite only being a recent addition to the area. Some of the minor roads suggested as transport routes such as Langary Gate Road and Queens Drove currently receive very little traffic, often only a hundred or so vehicles a day, thus the peace and quiet of these rural backwaters will be lost. An assessment of traffic flow and numbers should be conducted to fully assess the impact of extra traffic on the road system. Additionally, traffic management plans should be produced, plus a plan for road maintenance and repairs of damage incurred by heavy machinery and extra traffic flows.

Air Quality

Environmental warming is a common effect of large-scale solar farms, similar to heat hazes in cities. Similarly, the effect of construction traffic for a prolonged period is likely to influence air quality in a rural area.

Glint and Glare

Because the minor roads are so quiet, they are regularly used by cyclists, walkers, horse riders etc. There are few pedestrian pathways or pavements, thus any suggestion of passing places is likely to affect pedestrian traffic and human safety.

There is also concern that the project is very close to Crowland Glider Club and Fenland Airfield, as well as being used regularly as a flight path by Lincolnshire RAF air bases, thus Glint and Glare Assessments should be conducted from an aerial viewpoint as well as from the ground.

Major Accidents And Disasters

There is concern regarding increased traffic on the small local roads which generally have no pedestrian walkways. Traffic is generally very low, whilst livestock and wild animals, especially deer, often cause accidents since they either escape onto roads or cross without warning.

Fire risk is also a major concern particularly in Lincolnshire in the summer months, as the area is a purely arable landscape, not grassland. All it takes is a spark to generate a field fire. The combining and baling of combustible wheat and barley harvest crops, the inevitable giant straw stacks and questionable battery storage make a recipe for disaster. In addition, fire services locally, are generally on a retained basis and not always available at short notice. Arrival times may be delayed so responses to a fire would be slow, possibly leading to a major incident.

Traffic flow is highly likely to increase by more than 30% given the low level of traffic flow on these minor roads, certainly with up to 60 deliveries per day and 400 staff per day.

Kind Regards

Angie

Mrs Angela Harrison

Parish Clerk & Responsible Finance Officer
Deeping St Nicholas Parish Council



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Hannah Terry
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Development Services
Direct Dial Tel: 01354 654321
E-mail: planning@fenland.gov.uk

07 June 2024

Our ref: F/YR24/4020/LACON
Your ref: EN010169

Dear Hannah,

EIA Scoping consultation relating to Meridian Solar Farm

Thank you for your consultation letter, in reference to the above, received on 31st May 2024.

The proposal site is located approximately 1.5 miles from the Fenland district area. As such, we do not have any comments to make on this Scoping Opinion.

Yours sincerely,

Development Services

Richard Fitzjohn *SB*

Interim Senior Development Officer

Data Protection Act 1998

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From: [REDACTED]
To: [Meridian Solar Farm](#)
Subject: EN010169 - Meridian Solar Farm - EIA Scoping Consultation
Date: 21 June 2024 12:08:20
Attachments: [image001.jpg](#)

You don't often get email from [REDACTED]

Thank you for consulting the Forestry Commission on this proposal. As the Governments Forestry Experts, we endeavour to provide relevant information to enable the project to reduce any impact on irreplaceable habitat such as ancient semi natural woodland as well as other woodland. We can confirm there are no Ancient Semi Natural Woodlands within the site area. There are however, a few small isolated sections of woodland within the site, that were either established or managed through one of our legacy grant schemes. These grants may still be in obligation and therefore, the landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid in order to prevent public money being wasted.

There is also one small area of lowland mixed deciduous woodland within the site area. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone. A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change. Woodland also provides habitat for a range of Section 41 Priority Species including all bats.

There is no detail in the Scoping Report at present as to how the existing fragmented woodland will be protected during construction, or even if they will be retained.

It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme. Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees to ensure maximum gains to increase habitat connectivity and benefit biodiversity across the whole site, not solely in specific areas or just to be used as screening.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered.
- Woodlands need to be climate, pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)
- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

Access will also need to be considered for the future management of both existing and any proposed new planting.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor

East & East Midlands

 [@forestrycommission.gov.uk](mailto:sandra.squire@forestrycommission.gov.uk)



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This email has been scanned for viruses and malware.

From: [REDACTED]
To: [Meridian Solar Farm](#)
Subject: RE: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 04 June 2024 11:39:19
Attachments: [image003.jpg](#)
[image004.png](#)
[image005.png](#)

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Hi,

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455.

In case of an emergency please phone 0800 111 999.

Kind regards,



FPL - Conx Request

e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk

a: Fulcrum, 2 Europa View, Sheffield Business Park, Sheffield, S9 1XH, T: 03330 146 466

Tell us how we're doing:

We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedback@fulcrum.co.uk

From: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>

Sent: Friday, May 31, 2024 12:35 PM

To: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>

Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed Meridian Solar Farm.

Please note the deadline for consultation responses is 28 June 2024, which is a statutory requirement that cannot be extended.

Kind Regards



Gary Chapman | EIA and Land Rights Advisor (HEO)
The Planning Inspectorate

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Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN
meridiansolar@planninginspectorate.gov.uk

Your Ref: EN010169

27 July 2024

Dear Hannah,

**Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA regulations) – Regulations 10 and 11
Application by Meridian Solar Farm Ltd (the Applicant) for an Order granting
Development Consent for the Meridian Solar Farm (the Proposed Development)
Scoping consultation and notification of the Applicant's contact details and duty to
make available information to the Applicant if requested.**

In response to your letter of 31 May 2024 asking Gedney Hill Parish Council as a consultative body to either:

- Inform the Planning Inspectorate of the information the Parish Council considers should be provided in the Environmental Statement (ES); or
- Confirm that the Parish Council does not have any comments.

The Council would like to make the following points:

The Parish Council believes that potential environmental effects and impacts should be taken into account when determining if the project will help the UK meet statutory Net Zero and other climate ambitions and would like to see a detailed report comparing benefits and costs of changing the use of the land.

The Parish Council would like to see a detailed and independent evaluation of the measures that will be taken to enhance the natural landscape. The ES should clearly set out how this stark and intrusive construction will be blended into the existing landscape. We believe the proposed introduction of woodland is not in keeping with the existing landscape. The Parish Council would be keen to see remedial measures in keeping with the current landscape. We would also like to see a plan for how any landscape enhancements will be maintained over the life of the project.

The Parish Council would like to see a precise map of access roads. The ES needs to show how these very small local roads will cope with increased volumes and physical weight of traffic. The report should outline the plans for repair and maintenance of these roads, during construction, during the lifetime of the project and the decommissioning stage. We would also expect to see a plan for the roads that will be used in the case of the closure of your primary routes. We would like to see an independent assessment of the impact of any increase in traffic through Gedney Hill, either because the roads are being used as transportation links to the construction site or because traffic will use a route through the village when the other roads become too busy due to construction traffic.

The Parish Council believes that any change of use to the current landscape could increase the area's flood risk. The report should contain details of any drainage systems that will be required, where the water will discharge and the effect of this on the surrounding area, specifically land in and around Gedney Hill.

The Parish Council would like to see an independent assessment of the anticipated loss of existing biodiversity from the proposed project. We would like to see how the loss/gain of biodiversity will be measured and how it is proposed to minimise the impact on local wildlife during construction, during the project life and in the decommissioning stage.

The Parish Council would like to see an independent visual report assessing the visibility of the site both during the day and at night. In particular we are concerned about the impact of light pollution at night, on both people and wildlife.

The Parish Council welcomes the report's clarity on what will be built in terms of the Solar Farm but would like to see much more clarity on the effects of construction, this should include, but not be limited to, working hours, numbers of workers on site, numbers of vehicles using the roads and how long construction would be expected to take. We would also like to see further reporting on noise pollution, effects of vibration and changes in air quality particularly in the areas surrounding site D.

The Parish Council would like to see clear plans for the decommissioning of this site and how it will be returned to farming land. We would like to see an independent assessment of how the land will be effected and what this means for the environment.

Gedney Hill Parish Council thanks the Planning Inspectorate for allowing us to comment as a consultation body and hopes that our comments will be taken into consideration when the Environmental Statement is planned.

Yours sincerely,



Vicki Watson
Clerk
Gedney Hill Parish Council

FAO : Hannah Terry
Email : MeridianSolar@planninginspectorate.gov.uk
Date: 21st June 2024

NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Dear Hannah

**PROPOSED – MERIDIAN SOLAR FARM LTD
PROPOSAL BY – THE APPLICANT
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 31st May 2024 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project falls within the consultation zones of one major accident hazard site and one major accident hazard pipeline. The application boundary falls within the inner, middle and outer consultation zones of both sites.

This is based on the proposed site boundary as shown in Figure 1-1 Scheme Location from the Meridian Solar Farm EIA Scoping Report, Version 1.0, Dated 19/04/2024, [EN010169-000010-Meridian Solar Farm Scoping Report.pdf \(planninginspectorate.gov.uk\)](#) .

The major accident hazard site is HSE ref. 4812, Moulton Bulb Company Ltd.

The major accident hazard pipeline is operated by InterGen (UK) Limited and has the ref number 11622. The Applicant should make contact with InterGen (UK) Limited, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the Scoping Report "EN010149-000006-EN010149 - Scoping Report.pdf", it is unlikely that HSE would advise against the development.

Hazardous Substance Consent

There is no indication within the Meridian Solar Farm EIA Scoping Report, Version 1.0, Dated 19/04/2024, [EN010169-000010-Meridian Solar Farm Scoping Report.pdf \(planninginspectorate.gov.uk\)](#) that there are hazardous materials which are likely to require Hazardous Substance Consent.

Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Schedule 1 to be applied to those substances below-threshold quantities. Further information on HSC should be sought from the relevant Hazardous Substances Authority if required, or if changes to the scheme are made that introduce hazardous substances.

CONSIDERATION OF RISK ASSESSMENTS

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the Planning Inspectorate's Advice Note 11 Annex G - [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes a section "Risk Assessments" describing the applicable legislation containing the requirement for risk assessment and the role of the HSE.

There is a section titled Major Accidents and Disasters contained in Table 4.11 within Meridian Solar Farm EIA Scoping Report, Version 1.0, Dated 19/04/2024, [EN010169-000010-Meridian Solar Farm Scoping Report.pdf \(planninginspectorate.gov.uk\)](#) that provides a scope for the EIA to assess potential effects from the scheme relating to Major Accidents and Disasters. It is noted that in Table 4.11 under Key Issues and Potential Likely Impacts it states: "An overview of major accidents of disasters that will be further considered across all phases of the Scheme include but are not limited to:

- Flooding and severe weather;
- Fire/Explosion including risks associated with Scheme infrastructure such as BESS;
- Road traffic accidents;
- Aircraft disasters; and
- Utilities failures."

It would be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at NSIP.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

From: [REDACTED]
To: [Meridian Solar Farm](#)
Cc: [REDACTED]
Subject: HISTORIC ENGLAND ADVICE PL00796054 FW: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 28 June 2024 19:37:27
Attachments: [image003.png](#)
[image004.png](#)
[image005.jpg](#)
[image185492.jpg](#)

You don't often get email [REDACTED]@historicengland.org.uk. [Learn why this is important](#)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Meridian Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the Meridian Solar Farm (the Proposed Development.

Dear Ms Terry

Thank you for your letter of the 31st May 2024 requesting our EIA scoping advice.

HISTORIC ENGLAND ADVICE

We welcome an iterative approach to archaeological assessment and wider cultural heritage matters including the setting of buildings and monuments and designed landscapes.

We note that two scheduled monuments relating to Roman period settlement remains are included within the proposed scheme boundary, we would expect to see options for grassland reversion free of panels explored in the Environmental Statement. These scheduled sites represent those which when identified from aerial photographs were brought into statutory protection. This is not the result of an ongoing programme of designation review and it should be anticipated that other sites of equivalent importance within the scheme area are undesignated (see <https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>), certainly the extent of sites identified from air photographic survey has increased over time.

These are complex soils and require a suit of investigative approaches grounded in a sound Desk Based Assessment. Multi-technique geophysical survey, aerial, lidar and cartographic sources and deposit modelling should inform a programme of trial trenching (with regards to which we refer you also to the expertise of the local government archaeological officers / advisors). Lidar data requires specialist processing to bring out the micro-topography of these landscapes. They, alongside the historic environment record and conservation officers will be key sources of advice and expertise with access to additional records and local knowledge. Early and thorough pre-determination archaeological evaluation is key to management of archaeological and project delivery risks. Only by understanding the character and importance of remains can a credible strategy to address their significance though scheme design and detailing be brought forwards. The deposition of alluvial soils and peat formation can conceal upstanding archaeological features such as pre-historic burial mounds, such features should be considered in any modelling exercise in which depth of cover is considered since they may be particularly exposed to risk. Of key concern in respect of this scheme is to develop a sophisticated understanding of the former estate of the Abbey of Crowland including the scheduled and grade I listed abbey itself, Trinity bridge, former hermitage/ chapel sites and the estate boundary markers / crosses including Kenulph's stone (see references to publications below and in the bibliographies therein). Because the features relating to the Abbey form a group impacts upon parts of the estate should to a degree be considered in respect of the whole and artificial limits of consideration should not bisect the estate.

Detailed understanding of the impact of the proposed scheme on the experience of the historic

landscape both in its own right and as setting to the Abbey of Crowland and other associated assets is of critical importance in order for the scheme proposals to respond effectively and manage impacts through design. The modelling of past patterns of wet and dry land will aid not only in understanding the character of this landscape but also (through deposit modelling) in the prediction of areas of greatest archaeological risk. This was a much wetter landscape at times in the past, a rich source of wetland resources with areas of dry land set within marsh and channel, hence the crucial importance of deposit modelling to understand the context in which remains may survive across differing periods and in association with different spaces within that landscape.

The history of wetland abundance and exploitation can be traced through to the surviving remains of duck decoys such as that scheduled as NHLE 1006808, these are likely to have once been more numerous in this landscape and they and other wetland specific features deserve close attention.

Consideration needs to be given both to the below ground impacts of the scheme through piles, cable connections, substation / battery storage works etc but also the aesthetic and experiential impacts of the appearance of the arrays superimposed onto the existing agrarian appearance and the impact of other associated structures such as fencing or overhead pylon connections. The introduction of long runs of cable trench with associated permeable granular fills have the capacity to alter drainage patterns and affect the preservation of buried organic remains at some distance from these interventions, this should also be considered. Any measures to manage risk of flooding to new infrastructure should be modelled for their likely archaeological and visual impacts.

Given the relatively flat topography the visual impact of large structures may need to be considered in respect of the setting of prominent listed churches and towers etc over considerable distances and should not be constrained by fixed radii.

Please include the following as the primary address for all communications in respect of this scheme so that we can effectively log and track correspondence

HE Published Advice (includes but not limited to)

<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

<https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/heag314-planning-archaeology/>

<https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/>

See also

Wright, D. and Willmott, H. orcid.org/0000-0002-7945-7796 (2024) Sacred landscapes and deep time: mobility, memory and monasticism on Crowland. *Journal of Field Archaeology*. ISSN 0093-4690 <https://doi.org/10.1080/00934690.2024.2332853>

David Roffe in *Fenland Research* 8 (1993) <https://www.roffe.co.uk/articles/fenne.htm>

Caitlin Green (2020) <https://www.caitlingreen.org/2020/12/the-importance-of-lincolnshire.html>

The Estates Of Crowland Abbey, Frances M. Page Cambridge Uni Press, 1934

The Estates of Thorney and Crowland: A Study in Medieval Monastic Land Tenure, Sandra Raban University of Cambridge Department of Land Economy, 1977

In the Shadow of the Abbey: Crowland, Michael Chisholm, FastPrint Publishing, 2015

The book of decoys, Ralph Payne-Gallwey,

<https://archive.org/details/bookofduckdecoysx00payn/page/n7/mode/2up> John Van Voorst, London, 1886

e-midlands@HistoricEngland.org.uk

yours sincerely

Tim Allen

Tim Allen MA FSA

Team Leader (Development Advice)

Midlands Region

Historic England

The Foundry, 82 Granville Street, Birmingham B1 2LH

<http://www.historicengland.org.uk/> | [@HistoricEngland](https://www.instagram.com/HistoricEngland)



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From: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>

Sent: 31 May 2024 12:36

To: Ramsden, Simon <[REDACTED]@HistoricEngland.org.uk>

Cc: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>; Wormald, Luke

<[REDACTED]@HistoricEngland.org.uk>; East of England Region <e-east@HistoricEngland.org.uk>; Midlands ePlanning <e-midlands@HistoricEngland.org.uk>

Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

FAO Simon Ramsden and Luke Wormald

Dear Mr Ramsden and Mr Wormald

Please see attached correspondence on the proposed Meridian Solar Farm.

Please note the deadline for consultation responses is 28 June 2024, which is a statutory requirement that cannot be extended.

Kind Regards



Gary Chapman | EIA and Land Rights Advisor (HEO)
The Planning Inspectorate

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Case Officer: Lucy Smith
Our Ref: 24/01031/EIASCO
PINs Ref: EN101069

Borough Council of
**King's Lynn &
West Norfolk**



Stuart Ashworth
Assistant Director Environment and Planning

Meridian Solar Farm Ltd
c/o The Planning Inspectorate
Hannah Terry
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Via Email: MeridianSolar@planninginspectorate.gov.uk

11 June 2024

Dear Hannah

Thank you for your consultation, which was registered on 31st May 2024.

DESCRIPTION OF DEVELOPMENT - Scoping Opinion Relating To The Proposed Nationally Significant Infrastructure Project (NSIP), Meridian Solar Farm (The Proposed Development)
APPLICANT NAME - Meridian Solar Farm Ltd

I write to advise you that the scheme has been considered and this Local Planning Authority has no comment to make at this time.

Description of the Consultation Scheme:

Meridian Solar is a proposed solar farm south of Spalding and Holbeach which would supply around 750 Megawatts (MW) of electricity. The proposal also includes associated infrastructure such as co-located battery storage, and an approximate 12km Grid Connection to National Grid's planned Weston Marsh substation east of Spalding.

Meridian Solar is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008 which are considered by the Government to be so big that permission should be given at a national level – by the Planning Inspectorate on behalf of the Secretary of State.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment.

King's Court, Chapel Street, King's Lynn, Norfolk PE30 1EX
Tel: (01553) 616200
DX 57825 KING'S LYNN

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Borough Council of
King's Lynn &
West Norfolk



Kings Lynn and West Norfolk Borough Council have been consulted by the Inspectorate as part of this request for a Scoping Opinion. The Planning Inspectorate has requested that KWLN BCC informs the Planning Inspectorate of the information we consider should be provided within the Environmental Statement; or confirm that we do not have any comments.

Consideration:

It will be for the relevant LPAs and Planning Inspectorate to consider the implications of the development on the prevailing landscape character areas impacted, as well as implications for archaeology and biodiversity, and localised impacts during construction, operation and decommissioning.

Given the distance from the boundary of the Borough of Kings Lynn and West Norfolk, it is not considered that the proposals as put forward would significantly impact upon the visual character of Kings Lynn and West Norfolk.

We would request that consideration is made as to the routing and control of the transportation of vehicles, equipment and structures during land preparation, construction, and decommissioning, and in particular that controls are put in place to minimise disruption to any roads within or traversing the boundaries of Kings Lynn and West Norfolk, in order to reduce potential traffic and environmental impacts.

The Borough Council of Kings Lynn and West Norfolk have **no further comments to make at this time.**

[Redacted Signature]

Stuart Ashworth
Assistant Director
Environment and Planning
On behalf of the Council

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Amy Charlesworth
Infrastructure Officer
Planning Services
Lincolnshire County Council
County Offices
Newland
Lincoln, LN1 1YL

Email: NSIPS@lincolnshire.gov.uk

Sent by E-Mail to:
meridiansolar@planninginspectorate.gov.uk

Your Ref: EN010169
Date: June 2024

Dear Sir/Madam,

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application: Meridian Solar Farm comprising of the construction, operation, and decommissioning of a Solar PV generating facility with associated infrastructure including co-located battery storage and an approximately 12km grid connection to National Grid's planned Weston Marsh sub-station.

Location: South of Spalding on land between the River Welland and Sutton St. Edmund

Thank you for your letter dated 31 May 2024 consulting Lincolnshire County Council (LCC) on the Environmental Impact Assessment (EIA) Scoping Report prepared by Temple Group Ltd on behalf of Meridian Solar Farm Limited dated April 2024.

The Council have reviewed the information and have the following comments to make.

Planning Policy Context

Section 1.2 of the Scoping Report sets out the legislative context for EIA and Scoping. The Council is pleased to see reference to Lincolnshire County Councils adopted Mineral and Waste Local Plan, it should be noted that this document is currently under review, as such, any emerging local plan document should also be considered.

Cumulative Impacts

Section 3.6 of the Scoping Report identifies the proposed approach to cumulative assessment. The Council is pleased to see that both in-combination and the cumulative effects of a number of different projects will be considered as part of the assessment.

The study area for the assessment of inter project effects should be sufficient in extent to capture all relevant projects within the Lincolnshire geographical boundary. This assessment should include a review of planning applications and the development plan in Lincolnshire and also include other projects that are currently proposed through the Development Consent Order (DCO) process. Table 3.5 of the Scoping Report identifies cumulative schemes, however the Council are of the view that the number of projects currently identified is insufficient and particular consideration should be given to other Nationally Significant Infrastructure Project (NSIP) schemes. The inclusion of the Grimsby to Walpole National Grid Upgrade scheme is noted, however, there are several other NSIP schemes in Lincolnshire currently being proposed. These include, but not limited to, the Outer Dowsing, Eastern Green Link 3&4 and Lincolnshire Reservoir projects and 11 other NSIP scale solar scheme's in the County that are either in pre application, examination or recommendation/decision stage of the DCO process.

There is potential for significant cumulative impacts to arise from the combined effects of these schemes. For example, in respect of loss of best and most versatile (BMV) agricultural land and impacts on the transport network. Consideration should be given to the cumulative effects over the lifetime of the developments, for example the combined impacts of decommissioning (waste generation) of multiple solar schemes with similar 40 year lifespans.

Consultation with the Local Authorities is welcomed as to those projects that should be considered as Reasonably Foreseeable Future Projects (RFFPs). The list of developments should also be kept under review as several of the schemes mentioned above are likely to have completed the DCO process in advance of the Meridian Solar Scheme.

The Council would expect the Environmental Statement (ES) to contain a separate chapter on the assessment of cumulative effects covering both intra project and inter projects effects. Which, in addition to setting out the approach and methodology, clearly identifies all other relevant projects, the interrelationship between projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.

Heritage - Buried and Built

The Council are pleased to see that archaeology and heritage have been scoped in however while the Scoping Report states that sufficient evaluation is proposed there is no mention of trial trenching which is essential for the provision of baseline evidence, for the assessment of developmental impacts, for understanding the significance of surviving archaeology and for effective fit for purpose mitigation.

The standard suite of archaeological evaluation techniques of desk based work, geophysical survey and a robust trenching programme are required to inform reasonable mitigation of the developmental impact across the redline boundary as the range of proposed impacts on a landscape scale will damage and destroy currently unidentified surviving archaeology.

The document includes a number of aspects of the development which will impact archaeology: as well as the infrastructure and groundworks impacts there will for example be cabling to a depth of 1.2m (paragraph 2.5.25 of the Scoping Report) and there will be 1100 ha (1.1.3) of solar PV modules which will impact to a depth of up to 1.5m, well below the depth of surviving archaeology. The amount of cabling is not mentioned nor the extent of future impacts from refits during the 40 year lifetime of the scheme.

The Scoping Report also mentions additional planting of small, isolated blocks of woodland (2.5.35) and that 'The Scheme will include biodiversity enhancements which will focus on increasing the diversity of habitats' (2.5.36) and habitat creation (2.7.16).

Tree planting can be very destructive to underlying archaeological remains, the root structures of mature trees can be deep and cover areas several times the size of the tree canopy. The root structures can damage and destroy surviving archaeological features and change soil chemistry and hydrology, there can be uprooting from storm damage and when a tree dies the roots whither and leave voids which collapse. These and other mitigation measures including landscaping, scrapes and wildlife ponds can damage or destroy any surviving archaeology.

There will need to be sufficient trenching across the full redline boundary including proposed mitigation areas to ensure that mitigation measures serve their purpose without causing the destruction of currently surviving archaeology.

Cultural Heritage is included in section 4.2: Proposed Scope of the EIA and Potential Environmental Effects and covered in Table 4.2. Regarding the proposed Study Area, 1km is not sufficient. We recommend Historic Environment Record (HER) data for a 2km radius is required from the main site boundary and any proposed connection route options. Until they are descoped all cable route options need to be properly assessed as part of the development and as part of the ES.

Consideration should be given to any impacts upon heritage assets including built heritage and historic landscapes located within Lincolnshire. The Baseline Conditions as mentioned within Table 4.2 should also include non-designated heritage assets. The applicant is also advised to view 'The Historic Landscape Characterisation Project for Lincolnshire' which should be included as a data source and can be found on the Council's website here: www.lincolnshire.gov.uk/historic-environment/historic-landscape-characterisation

The Council would appreciate for a detailed map detailing the location of non-designated heritage assets for the proposed redline boundary, similar to those for designated assets shown in Figures 2.2, 2.5, and 2.6 of the scoping, along with the identifying number of each asset to be provided within the Environmental Statement. The Council would also appreciate ongoing consultation regarding the proposed zone of theoretical visibility.

All designated assets (i.e. Scheduled Monuments and Listed Buildings) within a 5km radius should be taken into account for setting assessments. The significance of each asset must be assessed prior to scoping which assets would be affected. Modelling should particularly include any identified assets which have the potential to be visible or have their setting affected by the taller elements of the development.

Table 4.2 includes a section on the Assessment Methodology, Stage 4 of which begins *'Having understood the cultural significance and importance of each asset'*. Significance and the importance of archaeological assets cannot be determined without ground-truthing by trial trenching.

Table 4.2's section on Baseline Development states that *'The desk-based research will be supported by a programme of archaeological evaluation surveys. A geophysical survey will be undertaken within areas of the Site boundary that are suitable for survey and where land access can be obtained by way of landowner agreement.'* The first of the standard suite of archaeological field investigation, geophysical survey is essential as a prospecting technique for informing the trial trenching programme. For those areas where geophysical survey is not undertaken a higher percentage of trenching will be required to determine the archaeological potential and understand the presence, extent, depth and significance of surviving archaeology which will be impacted by the development.

This section goes on to say that *'A detailed review of aerial photography and imagery, including transcriptions of potential assets, will also be produced.'* A full competent LiDAR and air photo analysis, interpretation and assessment is required for the redline boundary with full aerial photo coverage using all available oblique and vertical air photos including the Historic England Archive and Cambridge University Collection of Air Photos as well as RAF and Ordnance Survey photos including those held by LCC.

This section concludes that *'Further archaeological evaluation and detailed setting assessments will be undertaken as part of the assessment process, the scope of which will be informed by the desk-based analysis of information, the outcomes of the geophysical survey, the detailed aerial analysis and through consultation with relevant bodies. Further geoarchaeological assessment including deposit modelling may also be undertaken, informed by these earlier assessments and investigations.'*

While the Council looks forward to engaging with the archaeological consultant throughout the DCO process as it currently stands this is insufficient to provide enough baseline evidence or to inform a meaningful mitigation strategy.

In the Key Issues and Potential Likely Impacts section it is acknowledged that during the Construction Phase *'There is potential for previously unrecorded archaeological deposits to survive within the Scheme. These remains could potentially be impacted during construction works'*.

Archaeology is not mentioned in the Operational Phase however in the event of agreed mitigation including preservation in situ areas these will need to be fenced off and dealt with as laid out below with regard to the requirements for preservation in situ.

The Decommissioning Phase states that *'Decommissioning impacts are likely to be similar to any temporary impacts identified in relation to the construction phase of the Scheme. It is*

not anticipated that these effects would be significant.’ The Council does not agree, there are of course no temporary impacts on archaeology, it is a non-renewable resource. There is no information on the specific ground impacts of how infrastructure and the solar arrays will be removed or information regarding the impacts of refits throughout the 40 year lifetime of the scheme.

The Design, Mitigation and Enhancement Measures section states that one of the potential mitigation measures may be the *‘Removal of ground mounted solar PV panels from areas of significant archaeological deposits from the Scheme at the design stage.’*

If this proposed mitigation is being offered as preservation in situ mitigation the full extent of the archaeological areas must be determined and each area must be fenced off and subject to a programme of monitoring throughout the construction, operation and the decommissioning phases, and there will be no ground disturbance whatsoever which may disturb or affect the archaeological remains, including plant movement or storage. The fencing will need to remain in place and be maintained throughout the lifetime of the scheme including decommissioning and refits. There will need to be an Archaeological Clerk of Works and the management strategy for the preservation in situ areas will need to be included in the Construction and Environmental Management Plan (CEMP) to ensure the protection measures stay in place throughout the development.

‘Consideration will be given to the enhancement of heritage assets associated with the Scheme. Due to the potential complexity of the archaeological deposits, there may be opportunities to contribute to the understanding of the historic environment and the history of the area that contributes to its character. This information can be shared with the wider community through activities such as public engagement events, publications and interpretation information made available adjacent to the Site.’ This is welcomed and the Council looks forward to engaging with the engagement and public outreach aspects of this scheme.

The Consultation section should include engagement with the relevant District Council archaeological advisor and LCC’s historic landscape advisor.

The Assessment Assumptions and Limitations section includes *‘The assumption that access to undertake both intrusive and non-intrusive archaeological evaluation will be available and that the results will be available for inclusion in the ES’* Whilst the Council appreciates there will be challenges for any large scheme, for example land access, we strongly recommend that field evaluation be undertaken at the earliest opportunity to allow the work to be undertaken and the results to be available in good time to inform the baseline information and the subsequent agreed mitigation. Please be advised that most of Lincolnshire is not suitable for trenching over the wet winter months so it is pragmatic to ensure there is sufficient time during those seasons where evaluation work particularly trenching can be effectively undertaken.

Regarding the statement in the same section that *‘In the event that access is not available to areas of the Scheme the available research and data along with professional judgement will be used to assess the archaeological potential of the area.’* There are types of archaeology that do not come up in desk-based assessments or geophysical survey such as burials, where geology may affect geophysical survey results or where later human activity such as

Medieval ridge and furrow ploughing may mask earlier archaeological features. This is why trenching is necessary not only to ground-truth known or suspected archaeological activity but also to test so-called 'blank' areas where previous evaluation techniques have not identified archaeology. Significant areas of archaeology have been identified in these blank areas in every other NSIP across Lincolnshire, for Heckington Fen for example most of the mitigation areas were only identified during the trenching phase.

While as stated above the Council appreciates there will be access issues there must at some point be access so that the scheme can be built. In the event that no trenching can occur before the commencement of groundworks these areas will carry a very high level of risk which will need to be accommodated by incorporating flexibility in the work schedule and budget. Any unevaluated areas will need to be subject to stronger archaeological mitigation as the potential hasn't been determined, the mitigation of areas of unknown potential may need archaeological strip, map and record where the topsoil stripping is under archaeological control to allow the area to be opened up at the first archaeological horizon and the archaeology to be planned, investigated and recorded before the groundworks move on. It is therefore much preferred that sufficient trenching is undertaken across the full redline boundary to provide the essential baseline evidence to design a reasonable and fit for purpose mitigation strategy.

Sufficient field evaluation is an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leaves a high degree of risk to the development given the potential for archaeology to have significant impacts on work programmes and budgets. Failure to adequately evaluate the site at the application stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided and may ultimately lead to a scheme which is undeliverable. There is no public benefit in the destruction of unknown heritage assets.

In summary, a full desk based assessment is required as soon as possible including a full air photographic and LiDAR assessment of all readily available sources. Geophysical survey followed by trial trenching will be required across the redline boundary, the trenching results will be required as baseline evidence of the archaeological potential across the impact zone and to inform a reasonable and appropriate mitigation strategy to adequately deal with the impact of the development. This will need to include the solar array areas as their construction, refitting and decommissioning will cause impacts to depths up to 1.5m which is below the level of any surviving archaeology while associated groundworks will cause other impacts including compaction and changes to hydrology and soil chemistry. All these impacts will damage and destroy currently surviving archaeology without allowing archaeology to be preserved in situ or by record. Areas of archaeological significance therefore must be identified and understood.

The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states ***"The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the***

proposed development on...material assets, cultural heritage and the landscape."
(Regulation 5 (2d))

Transport and Access

The Scoping Report, in respect of transportation is considered to be acceptable. Table 4.9 of the Scoping Report identifies the proposed scope of the EIA to assess the potential effect from the scheme on transport and access. The Council is pleased to see the proposed scope follows standard guidance. The Highway Authority will be seeking to ensure the traffic impact is acceptable with regards to highway capacity and safety and promotion of sustainable modes in line with National Planning Policy. The Council will therefore be seeking a Transport Assessment (TA) and Construction Traffic Management Plan (CTMP) (including a Travel Plan) to address these issues and ensure any mitigation necessary is proposed. The Council is pleased to see these documents are proposed to be produced within the Scoping Report and that consultation with the relevant Authorities will be conducted (Table 4.9). The Council would like to highlight that the other NSIP schemes within the locality, as referred to above under cumulative impacts will need to be included in any transport cumulative assessment.

Public Rights of Way

The Council notes that the area impacted by the proposed scheme as detailed within the Scoping Report has a low density of Public Rights of Way (PRoW). The affected routes run around the boundaries of the land parcels identified. The Council wish to highlight the following to the applicant:

Existing Walking Facilities

Land Parcel A – Crowland BW 17 has not been identified as a walking facility and should be included within the baseline conditions identified within Table 4.9.

Land Parcel B and C – Crowland BW 11 has also been missed from the identified walking facilities within the baseline conditions identified within table 4.9. The Council would expect this to be identified and included within the ES.

Land Parcel D – The Council would like to highlight the bridleway network located on either side of the South Holland Main Drain which has not been identified within the baseline conditions, this bridleway network should be included within the ES.

Existing Cycling Facilities

The Scoping Report states 'No formal on or off-road cycling network'. As mentioned above, the report does not identify the bridleway network located on either side of South Holland Main Drain, this should be included within the baseline conditions of the ES as an existing cycling facility.

Existing Equestrian Facilities

Land Parcel A – The Scoping Report describes Deeping St Nicholas Public Bridleway No. 5. The Council would highlight that this route is a public footpath.

Land Parcel B and C – The Council considers the description for Crowland Bridleway BW 11 to be misleading, the Council seeks a description amendment so that the report is easier for the reader to understand. The Council suggests that this should read as 'Crowland BW 11

commences at Queens Bank and runs along the northerly boundary of parcel C to Eaugate Road.

Land Parcel D – The Council is pleased to see that the details for the affected Bridleways are correct.

Hydrology and Hydrogeology

The Council as Local Lead Flood Authority (LLFA) has reviewed the Scoping Report and have the following comments to make. Table 4.4 within the Scoping Report identifies the proposed scope of the EIA to assess Hydrology, Hydrogeology, Flood Risk and Water Framework Directive waterbody receptors. The Council raises no issues or concerns at this stage with regard to the proposed scope outlined for surface water flood risk.

Ecology

Based on Figures 2.3 and 2.4 and information presented in Tables 4.3, 4.3.1 and 4.3.2 of the Scoping Report the Council has the following comments to make relating to ecology and biodiversity.

Study area

The Scoping Report proposes a 15km study area for internationally designated sites and a 2km study area for non-statutory designated sites. The ES should ensure the study area reflects the project's Zone Of Influence (ZOI) rather than being based on a fixed distance. The ES should consider the potential for effects to occur beyond 15km, particularly where designated sites are designated for mobile species such as birds and bats.

Baseline conditions

There are 3 internationally important designated sites identified in Figure 2.3. These are The Nene Washes, Baston Fen and The Wash. There are also a series of nationally designated statutory sites (SSSIs) and non-statutory designated sites identified in Figure 2.4. The ES will need to assess the potential for impacts on these sites. Natural England should be consulted in relation to the requirement for a Habitats Regulation Assessments (HRA) for internationally important designated sites.

Figure 2.3 shows that the Wash Special Protection Area (SPA) and Ramsar site falls within 15km of the proposed development, but the Wash is not included in the list of sites in Table 4.3. In line with the previous comment relating to the project's ZOI, the ES should consider the potential for the proposed development site to provide Functionally Linked Land for bird species associated with the Wash SPA and Ramsar sites as well as Baston Fen and The Nene Washes.

Limited information is presented in the Scoping Report on the habitats currently present on site. A comprehensive suite of habitat surveys using standard methodologies will be required to both enable identification of impacts and to undertake a Biodiversity Net Gain (BNG) assessment.

The Council would expect to see a plan identifying where any TPO, veteran and ancient trees/woodlands are located within the site and showing that consideration has been given

to suitable working distances within proximity to trees. The Council advises that the Ancient Woodland Inventory (AWI) for the County is currently being updated by the Greater Lincolnshire Nature Partnership. The applicant should ensure that the most up to date information is being used to assess impacts. In addition to this the AWI generally omits woodlands smaller than 2ha. Therefore, the applicant should ensure that all woodlands in the ZOI have been suitably assessed to demonstrate the absence of potential ancient woodland.

The Council agrees that the following list of species / species groups should be scoped into further studies:

- Birds – wintering and breeding
- Great crested newt
- Bats
- Otter and water vole

Breeding bird surveys should be designed to ensure that Schedule 1 species whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey (e.g. due to the timing of their breeding activity) are accurately recorded. The Preliminary Environmental Information Report (PEIR) should provide more detail on the approach to Schedule 1 birds. Relevant species will include but may not be restricted to barn owl, quail, red kite, hobby and marsh harrier.

Wintering bird surveys should be designed to ensure that adequate information is available to inform HRA for internationally important designated sites.

Botanical surveys should be sufficiently detailed to detect the presence of populations of scarce arable plants on the site as well as the presence of invasive non-native plant species.

The Council considers that it is premature to scope out the following species / species groups based on the evidence currently provided:

- Badger
- Reptiles
- Fish

The Council agrees that the following can be scoped out on the basis that these species are not currently known to be present in the area or due to lack of suitable habitat on the development site:

- Aquatic invertebrates
- White clawed crayfish
- Hazel dormouse
- Red squirrel
- Pine marten

The Council agrees that terrestrial invertebrates can also be scoped out of further surveys but suggests that desk survey information from these species may be useful to inform mitigation and biodiversity net gain plans.

The Council agrees with the list of both direct and indirect effects identified in the Scoping Report to be scoped into further assessments. These are:

- Habitat loss
- Species mortality
- Contaminated surface water in relation to construction activities
- Habitat fragmentation
- Noise disturbance
- Dust pollution
- Light pollution

Cumulative Assessment

This development is one of several proposed and large NSIP solar schemes within the County. Therefore, the combined implications for habitat loss, land-use change, and associated impacts on species will need careful consideration in the final DCO application. More detail on this should be provided at PEIR stage.

Approach to Biodiversity Net Gain

The Council welcomes the Applicant's intention to deliver a minimum of 10% BNG. Given the scale and nature of the Proposed Development, the Council will expect the project to deliver significantly in excess of 10% BNG. A BNG assessment should be undertaken using the Statutory Biodiversity Metric.

The Council advises that proposals for habitat enhancement within the Habitat Management and Monitoring Plan should be realistic and demonstrate meaningful biodiversity gain over and above any mitigation measures proposed. Details and locations of proposed enhancements and associated management should be provided at PEIR stage.

LCC's Infrastructure Ecologist will be happy to work with the applicant, their consultants and other stakeholders throughout the EIA process to ensure that ecological elements of the application are properly addressed, and that scheme secures the maximum potential benefits for biodiversity.

Landscape and Visual Impact

A review of the Scoping Report has been carried out by AAH Consultants on behalf of LCC and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following document:

- *Meridian Solar Farm EIA Scoping Report; Version 1.0; 19/04/2024. Prepared by Temple Group Ltd. for Meridian Solar Farm Limited.*

We expect the production of the Landscape and Visual chapter of the ES, which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- ‘Guidelines for Landscape and Visual Impact Assessment’, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- ‘An Approach to Landscape Character Assessment’, Natural England (2014);
- ‘Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals’, 17th September 2019 by the Landscape Institute (LI);
- ‘Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)’, 10th January 2020 by the Landscape Institute (LI) ;
- ‘Technical Guidance Note (TGN) 04/20 Infrastructure’, April 2020 by the Landscape Institute (LI); and
- ‘Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations’, May 2021 by the Landscape Institute (LI).

Overall, we would expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Meridian Solar Farm, as a NSIP, follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with LCC and other appropriate stakeholders:

- Landscape and Visual Impact Assessment Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

While the focus of this review is on Landscape and Visual matters, other information provided within the report, and any associated Appendices, has also been considered, providing background and context to the site. At this initial stage of the NSIP process, the content and level of information provided by the developer within *Section 4.2, Table 4.6 Landscape and Visual* (as a topic to be “Scoped In”) are generally considered satisfactory, however, as stated previously, we would expect to discuss this content and approach as part of the iterative process.

The following should be considered in the evolving assessment and layout:

Viewpoints

The final locations of viewpoints are to be reviewed and agreed with LCC and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, as well as consider potential key, or sensitive, viewpoints or visual receptors. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant's team in regards to proposed viewpoints.

Photomontages

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The methodology provided at *Table 4.6* is typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the methodology is further interrogated at the next phases of the project.

Paragraph 3.3.8, as part of the overall EIA Approach and Methodology in Section 3, identifies that Significant effects are identified as those that are Moderate or above. This is acceptable and expect this be consistently followed through into the LVIA.

The methodology should also clearly lay out the process of assessing temporary and permanent elements of the scheme, and the LVIA should clearly identify those elements that would not be decommissioned at the end of the life of the development, and assessed accordingly.

Scope of the Study Area:

It is acknowledged in *Table 4.6* that, based on a preliminary Landscape and Visual Impact Assessment study area and draft Zone of Theoretical Visibility (ZTV), an initial Study Area covering 5km has been allowed for the proposed development. At this early stage, we recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and it is not clear if the ZTV mapping within *Figure 4.6.1* only includes for potential visibility within 5km, or if no visibility beyond 5km has been identified. The ZTV mapping would be updated once the proposals have developed and the study area should not be fixed until the full extents of visibility are known from both desktop and site work.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

Only the National Landscape Character Area that the site is located within has been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and need to include relevant published landscape character assessments and likely a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character of the site and study area.

Visual

Several visual receptors are identified within *Table 4.6.1*. However, at this early stage of the project we request these be reviewed and consulted upon further once proposals have been developed and we are not in a position to confirm their inclusion or omission. We would expect that the visual assessment would include for identification of visual receptors, and not just an assessment of any agreed viewpoints, which should clearly cross reference viewpoints to associated receptors.

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage, sub-stations, CCTV poles and boundary fencing, which may be more visible than panels due to height, mass and extent.

In regards to the Electricity Export Connection to NETS, section 2.6 identifies that “*cabling will be overhead, underground, or a combination of the two*”. We wish to note that overhead cabling and pylons are likely to create additional and wider adverse visual effects, over underground cabling, which in turn would likely be of increased concern for local communities. We would welcome the opportunity to discuss the approach further at the pre-application stage.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular commercial scale solar developments, as appropriate in regards to proximity and scale. This should consider both Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects.

Residential Visual Amenity Assessment

While referenced in a section within *Table 4.6*, the extent as to which a RVAA should be considered within the ES (based on the Landscape Institute TGN 2/19). At this stage it is unclear if there are residential properties with receptors likely to experience significant effects to their visual amenity that would meet the visual amenity threshold, and recommend a Residential Visual Amenity Survey is scoped into the ES, which will ascertain if there are. The scale of the scheme has the potential to give rise to significant effects to local residents, and

also the layout should respond to views and proximity to these properties and residents to mitigate any potential adverse effects.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have a negative effect such as appearing out of character or foreshortening open or panoramic views. Any Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

Land and Soils

The Council has the following comments to make regarding lands and soils and the proposed scope of the EIA to assess land and soils as referenced within Table 4.5 of the Scoping Report.

- A detailed base line ALC is expected, subject to Natural England consultation, it is likely to cover the whole area and be in detail at a standard density of 1 auger bore per hectare.
- It is highly likely that the bulk of the site will be BMV quality.
- A Soil Management Plan is also expected to include construction, management and decommissioning.
- The Scoping Report suggests that the cable and grid connection routes will not be scoped into the ES, but with the amount of land drainage on site, the Council are of the opinion that this should be reconsidered.
- At the moment the cable routes have not been surveyed in detail, but once clearly identified this should be undertaken.
- The Council requests that consideration is given regarding the production of a soil health assessment and input to loss of land for food production and the impact on any agricultural holdings affected.

Section 4 of the Scoping Report sets out the main topics to be considered for scoping in, including Soils and Agriculture, Table 4.5 identifies the proposed scope of the EIA to assess agriculture and soils which considers soil resources, agricultural land resources and contaminated land .

The Site Context in terms of agricultural land and soils is mentioned within paragraph 2.2.1 and the baseline conditions section of Table 4.5.

The PV Area is level and low lying at 0 m aerosol optical depth (AOD) and in use for arable and horticultural cropping at the time of survey. The land is extensively ditch drained. The Council notes that land drainage is a key factor in assessing both land classification and the impact on land restoration particularly along any cable or grid connection route, where trenches are dug, or where soils are stripped even temporarily. The Council welcomes the provision of provisional Agricultural Land Classification (ALC) maps as mentioned within paragraph 2.2.7 and would like to highlight an earlier ALC over part of the site, which was conducted as part of an airport proposal, this indicates that the majority of the land locally is BMV (best and most versatile)(Appendix 1).

Agricultural Land Classification and Soils

The Council notes that the Scoping Report confirms that the site has only been preliminarily appraised for ALC, maps and some details are provided. Land Research Associates have undertaken preliminary advice, including a provisional survey, it goes on to state:-

That ‘the assessment is designed to consider the effect of the Scheme on two sensitive receptors: soil resources and agricultural land quality’

‘The impact of the Scheme to agricultural land and soil resources will be assessed using significance and magnitude criteria developed by Land Research Associates. The assessment will be carried out at three stages of the Scheme: construction phase, operational phase, and decommissioning phase...’

For the purposes of this assessment:

- A total permanent loss/gain of BMV land which exceeds 20ha is considered significant;*
- A loss of BMV which is either temporary and reversible after construction, or which falls below the 20ha threshold, is considered as being not significant; and*
- A loss of non-BMV land is considered as being not significant.*

The Council notes that at present there is no settled consensus as to whether a long term temporary use of land should be considered as not significant and therefore the loss of any BMV over the 20 hectare threshold may still be significant and should be considered within the ES.

ALC Survey Methodology

The Council notes that soil augering of the site should be undertaken in line with TIN 049 and the MAFF 1988 Guidelines, one auger point per hectare and with occasional soil pits particularly where soil types vary. On a site of this size the amount of augering should be around 1,000+ auger holes and probably 6 or 8 pits to verify the soil profiles – more if there are significantly different soils.

The anticipation with this site is that it will be largely, or all BMV:-

Using the available information, the geology and soil associations mapped over the Site are likely to give land of 'best and most versatile' agricultural quality. The initial findings of the reconnaissance survey have shown the land to be mainly of Subgrade 3a quality with areas of Grade 1, 2 and Subgrade 3b. The land is primarily limited by wetness and workability constraints.

Cable Routes

At the moment the cable routes have not been surveyed in detail, but once clearly identified this should be undertaken.

The Council notes that the cable route will be a temporary construction feature with soils reinstated. The Council would expect that a soil management plan should also consider the cable route in order to minimise the impact on soil structure, land drainage and ultimately soil quality.

The route passes across and will be buried under mainly open countryside that is largely arable farmland.

Two key groups of impacts have been identified elsewhere for the purpose of defining receptor sensitivity and impact magnitude:

- Land use and tenure: these are the potential impacts on human activity, including landowners, occupiers, local communities and other land users
- Agriculture: these are potential impacts on the soil resource, the surrounding environment and the agricultural productivity of the land.

The Council raises additional concerns including land drainage impact during construction and restoration of cable trenches. These impacts should be considered further.

Cumulative ALC Impacts

As noted above, under cumulative impacts there are 11 other NSIP scale solar scheme's in the County that are either in pre application, examination or recommendation/decision stage of the DCO process. This is an evolving picture as new proposals continue to be brought forward. There is potential for significant cumulative impacts to arise from the combined effects of these schemes. An example of these impacts would be in respect of Lincolnshire's BMV agricultural land as Lincolnshire is located within a particularly agricultural area with substantial areas of land within the Best and Most Versatile category. Consideration should be given to the cumulative effects over the lifetime of the developments. The Council notes that for a project of this scale there would be an impact, the project will tie up agricultural land for up to 40 years. The area is large, particularly within a local context and if the quantities of BMV are as stated or similar then the impact will be reasonably large and the Council would expect the impact to be significant at a County Level.

Design, Mitigation and Enhancement Measures

The Council welcomes the provision of a site specific soil management plan and agrees with this inclusion of

‘means of soil protection from compaction damage; remedial measures to remove damage; depth and method of soil stripping during cable laying; soil handling advice and

timings'. This will mitigate the potential effects of the construction and decommissioning phase.

Soil Structure

The Council highlights that soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction. The impacts to soil structure should be considered within the ES.

Ecological effect

The Council notes that should the land be used for biodiversity, it would not be available for agriculture. However, even if it is available for some form of cutting or grazing it is unlikely that the ALC grade will change significantly during the life of the project. There is evidence that organic matter builds up in biodiversity areas at a faster rate than arable farmland and this may benefit the land, but this is not a factor in the assessment of ALC. In the long term, where biodiverse land becomes ecologically important there is the possibility of land becoming assigned with environmental designations, such as SSSI status, though it is noted that generally this has not so far occurred on other solar sites.

Summary of Aspects

The Council notes that soil resources within the PV area, grid connection corridor and cable connection corridors have been scoped out. However, in this location with considerable pumped drainage and a large array of ditches the council considers it appropriate to reconsider scoping out the Cable and Grid corridors at this stage.

Human health

Overall, the Council is satisfied with the scope of the report from a human health perspective.

The Council welcomes that "landscaping may introduce advanced planting including the restoration of hedgerows as well as the additional planting of small, isolated blocks of woodland" as access to such is good for both physical and mental human health. The cable corridors could provide opportunities for linear green spaces or corridors to increase biodiversity and possibly create footpaths or cycle routes. Construction will be ongoing for two years, during which time disruption to local receptors must be kept to a minimum and especially dust. The Scoping Report states that a "plan for Site reinstatement and habitat creation will be established post the construction phase." It is felt that this should be available sooner and that as much landscaping and habitat creation as possible should be undertaken at the earliest opportunity to allow trees, etc., to become established before the site is operational in 2033.

The Council requests that consideration is given to alternative measures for 'vegetation management' which could promote human health. It is disappointing that activity on the site will be restricted to keeping the site in working order and secure. "Vegetation management" suggests grass cutting, strimming, and using weedkiller. Alternatives, such as

grazing pasture and wildflower meadows should be given consideration. On decommissioning, the Council highlights the site should be left in an improved state with underground cabling, etc., removed from any land that is to be returned to agricultural use.

The assessment of the effects on receptors, and the sensitivity of those receptors, appears to be using a robust methodology and includes cumulative effects. This leads to mitigation against adverse effects. However, the Council does not consider that “compensation” alone is sufficient. There is an opportunity to enhance the local area and help enable residents to live healthier lifestyles, it is noted that enhancements (e.g., active travel and accessible open spaces opportunities) are mentioned elsewhere in the Scoping Report . The Council is pleased to see that the EIA will include a chapter dedicated to Socio Economics, Human Health, and Land Use, to address all possible adverse physical and mental health risks and concerns. The initial assessment of population demographics, health profiles and socio-economic indicators in the Scoping Report is welcomed. Ideally The council would like to see a comprehensive health impact assessment (HIA) as one of the associated assessments, produced with public involvement, to help alleviate the concern of locals. This would also maximise the positive improvements that could be designed into the development. Irrespective, the assessment of Human Health should cover:

- Likely and potentially significant issues associated with the proposed development based on a preliminary judgment of significance. It should be ensured that any significant health effects identified are brought together in one place.
- Potential health impacts associated with electromagnetic fields around substations, powerlines, and cables, as is proposed through a high-level electromagnetic field assessment. It needs to be demonstrated that potential actual exposure to radiation (which includes electromagnetic fields) will comply with exposure limits developed by the International Commission on Non-Ionizing Radiation Protection. Evidence on potential exposure to radiation must be considered.
- Scope for significant adverse visual effects resulting from the introduction of solar panels and associated infrastructure. The Landscape and Visual chapter should ensure that both the potential effects on mental health and wellbeing because of any reduction in landscape amenity and the potential sense of enclosure are specifically referenced, and that this includes reference to how potential impacts across the range of identified sensitive receptors could change over time and during worst case periods.

Assessment of Alternatives

The Council wish to raise concern in regard to the potential prematurity of the scheme, as detailed within Section 2.4 description of the scheme and Section 2.6 Electricity Export Connection, the proposed point of connection for this scheme would be Weston Marsh Substation. This substation is proposed as part of National Grid’s Grimsby to Walpole NSIP, this DCO application has not yet been submitted. Grimsby to Walpole’s current suggested timeline states plans for DCO submission in 2027 with the target of being fully operational by 2033. Should the Weston Marsh substation as proposed within National Grid’s scheme not come to fruition there is no alternative connection option proposed.

The Council welcomes the assessment of alternatives as mentioned within section 3.7 of the Scoping Report and suggests further consideration surrounding grid connection options.

**Proposed Topics to be Scoped Out
Waste**

As outlined within the Scoping Report a description of the potential streams of construction, operational and decommissioning waste and estimated volumes will be outlined within the ES, this is welcomed. Consideration should be given to the impact of this waste, in terms of how and where it is disposed of and its transportation from the site. Given the number of other solar schemes within Lincolnshire that would be operating on similar timescales there is potential for significant amounts of waste to be generated at the decommissioning stage. The impact from replacement of solar arrays and/or decommissioning should also be considered cumulatively with these other developments.

Should you have any queries please do not hesitate to contact me.

Yours faithfully,
Amy Charlesworth

**For Neil McBride
Head of Planning**

Appendix 1

Map of Soils Already surveyed in Detail on part of the Site

From: [LINCS-SECTION106 \(NHS LINCOLNSHIRE ICB - 71E\)](#)
To: [Meridian Solar Farm](#)
Cc: [LINCS-SECTION106 \(NHS LINCOLNSHIRE ICB - 71E\)](#)
Subject: FW: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 24 June 2024 11:54:09
Attachments: [image001.png](#)
[image002.png](#)
[Letter to stat cons Scoping & Reg 11 Notification.pdf](#)

You don't often get email from licb.lincs-section106@nhs.net. [Learn why this is important](#)

Good Morning

Thank you for sharing the attached letter.

The NHS Lincolnshire ICB are pleased to see that the health sections have been included in the project.

There are no further comments we wish to share at this point.

Kind Regards

Patrycja

Patrycja Bienko

Section 106 Team

NHS Lincolnshire Integrated Care Board

Email: licb.lincs-section106@nhs.net

From: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>

Sent: Friday, May 31, 2024 12:34 PM

To: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>

Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

Some people who received this message don't often get email from meridiansolar@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear Sir/Madam

Please see attached correspondence on the proposed Meridian Solar Farm.

Please note the deadline for consultation responses is 28 June 2024, which is a statutory requirement that cannot be extended.

Kind Regards



Gary Chapman | EIA and Land Rights Advisor (HEO)
The Planning Inspectorate

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From: [Moulton Parish Council](#)
To: [Meridian Solar Farm](#)
Subject: objections
Date: 26 June 2024 11:26:27

To Whom it may Concern,

The Moultons Parish Council would like to make you aware of their concerns regarding this project. We have had a large volume of worried residents contact us as a council. Those and the councillors have huge concerns in regards to the loss of valuable farmland in the area, the effect it will have on wildlife along with the visual impact the solar panels will create.

I am sure you have many more concerns along the same lines.

Kind Regards
Lisa Edgeley

Parish Clerk.
Moulton's Parish Council

Tel: [REDACTED]
E-mail: clerk.moulton@gmail.com
<http://parishes.lincolnshire.gov.uk/moulton>

From: box.assetprotection
To: [Meridian Solar Farm](#)
Subject: FW: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 05 June 2024 08:59:22
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Letter to stat cons Scoping & Reg 11 Notification.pdf](#)

Good Morning,

Thank you for your email.

Regarding EIA Scoping Notification and Consultation for Meridian Solar Farm there are no National Gas assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Hayley White
Asset Protection Assistant



[@nationalgas.com](mailto:hayley.white@nationalgas.com)



National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

From: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>
Sent: 31 May 2024 12:34
To: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>
Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed Meridian Solar Farm.

Please note the deadline for consultation responses is 28 June 2024, which is a statutory

Tiffany Bate
Development Liaison Officer
UK Land and Property
[REDACTED] [@nationalgrid.com](mailto:[REDACTED]@nationalgrid.com)

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
meridiansolar@planninginspectorate.gov.uk

28 June 2024

Dear Sir/Madam

APPLICATION BY MERIDIAN SOLAR FARM LTD (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MERIDIAN SOLAR FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 31st May 2024 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines within the scoping area. The overhead lines forms an essential part of the electricity transmission network in England and Wales.

Overhead Lines

2WS ROUTE 400 kV OHL	BICKER FEN - SPALDING NORTH - WEST BURTON SPALDING NORTH-WALPOLE
4ZM ROUTE 400 kV OHL	SPALDING NORTH - WALPOLE BICKER FEN - WALPOLE - WEST BURTON BICKER FEN - SPALDING NORTH - WEST BURTON

I enclose a plan showing the location of NGET's apparatus in the scoping area.

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. <https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd>

Proposed New Onshore Infrastructure

Grimsby to Walpole (G2W)

The Grimsby to Walpole upgrade is a proposal to build a new high voltage overhead line in Lincolnshire, including building new pylons and up to five new substations including Weston Marsh Substation which forms part of the G2W Project.

Eastern Green Link (EGL) 3 and 4

The EGL 3 project will be a new offshore High Voltage Direct Current (HVDC) electrical link from Peterhead to the Norfolk area.

EGL4 will be a new offshore HVDC electrical link from east Scotland, also to the Norfolk area.

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

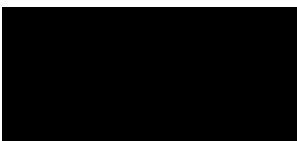
Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

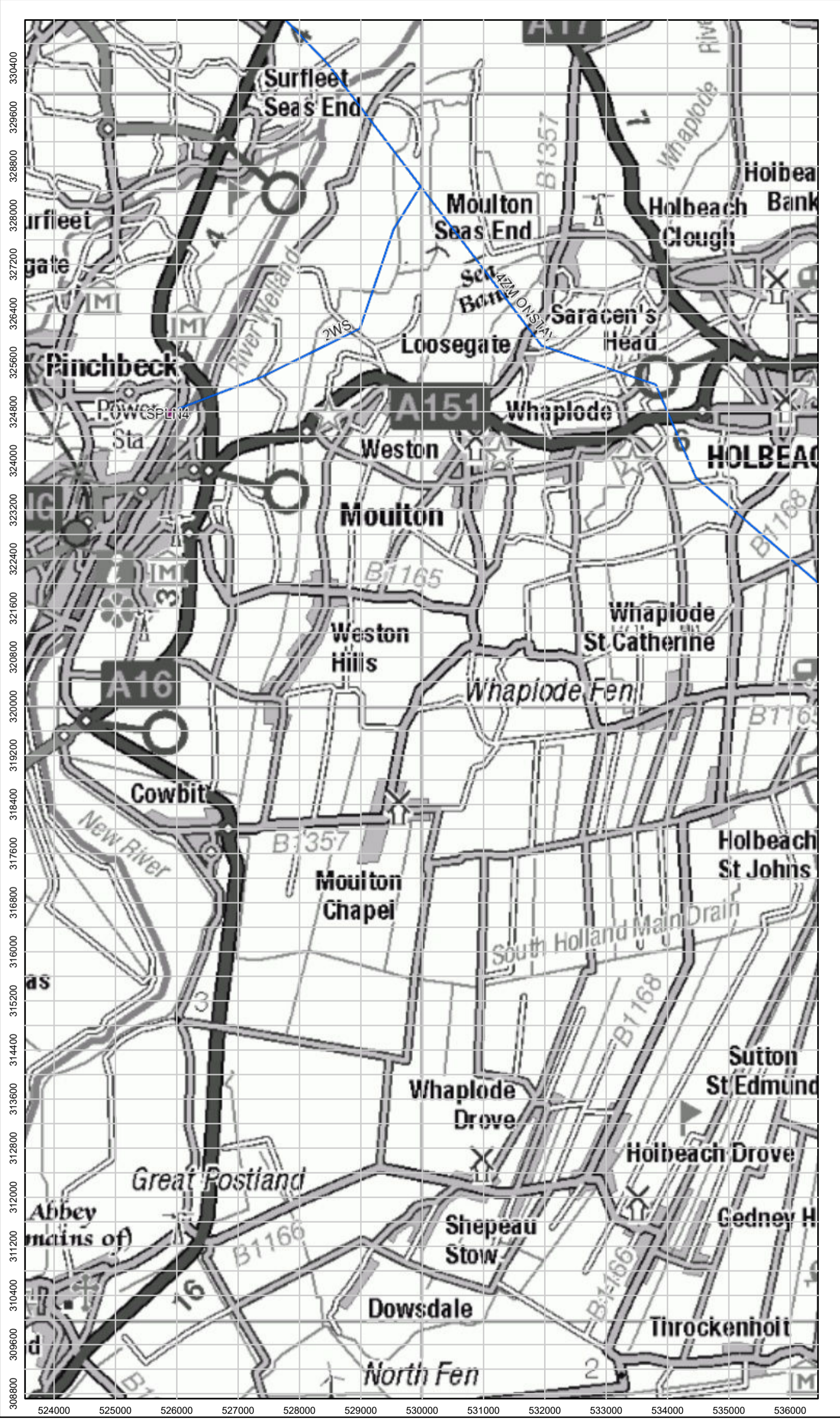
I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



**Tiffany Bate
Development Liaison Officer
Commercial and Customer Connections
Electricity Transmission Property Land and Property**



Legend

- OHL 400kV
- OHL 400kV Commissioned
- Substations
- Substations Commissioned

Notes



Date: 27 June 2024
Our ref: 478037
Your ref: EN101069



The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Hannah Terry

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Meridian Solar Farm with BESS and connectivity corridor
Location: Land South of Spalding, Lincolnshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 31 May 2024, received on 31 May 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Natural England have been engaged by the applicant in Pre-Application discussions via our Discretionary Advice Service. To date, advice relating to ornithology and Best and Most Versatile land has been provided. Natural England will continue to engage with the applicant throughout the pre-application stages.

For any further advice on this consultation please contact the case officer Robbie Clarey (robert.clarey@naturalengland.org.uk) and copy to consultations@naturalengland.org.uk.

Yours sincerely,

Robbie Clarey
Senior Sustainable Development Officer – NSIPs
East Midlands Area Delivery Team

Annex A – Natural England’s Advice on EIA Scoping

1- General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

Based on Natural England’s engagement with the applicant to date, and the EIA Scoping Report provided, it appears that these principles are likely to be met.

2- Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before

completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Plans or projects that Natural England are aware of that might need to be considered in the ES	
Project /Plan	Status
Mallard Pass Solar Project	Plans or projects for which an application has been made and which are under consideration by the consenting authorities.
Beacon Fen Solar Project	Plans and projects which are reasonably foreseeable.
Heckington Fen Solar Project	Plans or projects for which an application has been made and which are under consideration by the consenting authorities.
Anglian Water Lincolnshire Reservoir	Plans and projects which are reasonably foreseeable.
Temples Oaks Renewable Energy Park	Plans and projects which are reasonably foreseeable.
National Grid -Grimsby to Walpole energy transmission	Plans and projects which are reasonably foreseeable.
Outer Dowsing Offshore Wind (Onshore energy transmission)	Plans or projects for which an application has been made and which are under consideration by the consenting authorities.

3- Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4- Designated nature conservation sites

International and European sites

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance (European sites). This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Natural England have been in discussion with the applicant with regard to their ornithology survey scope, relevant to the SPA & Ramsar Birds known to utilise Functionally Linked Land within proximity to the Development site. Discussions are ongoing in relation to the scope of a second year of wintering bird surveys & assessment of impacts following this.

Table 4.3.1 of the EIA Scoping Report sets out the Statutory Designated Sites within 15km of the proposed development site, however, the list of sites provided has omitted The Wash SPA, SAC and Ramsar site which lies well within 15km of the proposed development site, as illustrated within Figure 2.3. In addition, earlier in the report it is noted that 'national statutory designated sites' (i.e. SSSIs) have been limited to a 2km search area, whilst footnote 56 clarifies that 'statutory designations' include International Designations, as well as SSSIs, NNRs and LNRs. Several SSSIs fall within 15km, but outside 2km of the proposed development area.

Natural England always advise that our SSSI Impact Risk Zones are used to inform the scoping of potential impacts to SSSIs from development. In addition, we would advise that application of standard threshold distances for assessment may not be suitable, especially when sites support mobile/migratory bird species and/or may be impacted via a pathway originating further than the threshold used.

For the purposes of the Scoping exercise, we have provided below a table of the relevant internationally designated sites, stating whether we consider they should be scoped in or out of further assessment in the ES (Table 1). We have also set out in the following section, 'Nationally Designated Sites', a table of nationally designated sites we consider should be scoped in or out of further assessment in the ES (Table 2).

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required (Red=Scoped Out, Green = Scoped in)
The Wash & north Norfolk Coast SAC	All Habitats & Species noted on the SAC Citation	The Wash SAC is hydrologically connected to the proposed development site; as such, there may be scope for impacts to both the habitats and species within The Wash via pollution of surface waters as a result of the construction of the development. It is noted that surface water contamination during construction is scoped into the assessment (EIA Scoping Report Table 5.1).

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required (Red=Scoped Out, Green = Scoped in)
		<p>Otter and Harbour Seal are mobile species, which may use watercourses outside the SAC boundary. Consideration should be given to any possible effects of the Cable works upon watercourses linked to the SAC.</p>
The Wash SPA	<p>Wintering Birds, in particular Pink Footed Geese</p>	<p>The proposed solar PV area lies within 20km of The Wash; the cable route corridor extends significantly closer to within 10km of The Wash. The proposed development site also triggers an Impact Risk Zone for Goose and Swan Functional Land. As a result, impacts to wintering birds associated with The Wash SPA via loss of and disturbance to Functionally Linked Land during construction and operation should be assessed within the ES.</p> <p>The Possible Overhead Lines to be used for the Grid Connection pose a significant threat via bird strike. Impacts to SPA birds from bird strike during both construction and operation should be included within the ES. Table 5.1 states that the risk of bird strike during construction is minimal and should be screened out. Natural England disagree and consider that despite the localised area and short timescales, bird strike during construction should be assessed within the ES.</p>
The Wash Ramsar	<p>Wintering Birds, in particular Pink Footed Geese</p>	<p>As above for the Wash SPA.</p>
Nene Washes SAC	<p>None</p>	<p>The sole feature of the SAC is Spined Loach. There is no Hydrological connectivity between the Site and this SAC; no other impact pathways are likely to be present. Natural England consider further assessment of impacts to the Nene Washes SAC can be scoped out.</p>
Nene Washes SPA	<p>Wintering Birds</p>	<p>The proposed development lies approximately 10km from the Nene Washes SPA. The proposed development site also triggers an Impact Risk Zone for Goose and Swan Functional Land. As a result, impacts to wintering birds associated with the Nene</p>

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required (Red=Scoped Out, Green = Scoped in)
		<p>Washes SPA via loss of and disturbance to Functionally Linked Land during construction and operation should be assessed within the ES.</p> <p>Although being further North from this SPA, the Possible Overhead Lines to be used for the Grid Connection continue to pose a significant threat via bird strike. Impacts to SPA birds from bird strike during both construction and operation should be included within the ES.</p>
Nene Washes Ramsar	Bewick's Swan & Wetland Breeding Birds	<p>The proposed development lies approximately 10km from the Nene Washes Ramsar. The proposed development site also triggers an Impact Risk Zone for Goos e and Swan Functional Land. As a result, impacts to Bewick's Swan & Wetland Breeding Birds associated with the Nene Washes Ramsar via loss of and disturbance to Functionally Linked Land during construction and operation should be assessed within the ES.</p> <p>The Possible Overhead Lines to be used for the Grid Connection also pose a significant threat to Swans. Impacts to the Ramsar features from bird strike during both construction and operation should be included within the ES.</p>
Baston Fen SAC	None	The sole feature of this SAC is Spined Loach. There is no Hydrological connectivity between the Site and this SAC; no other impact pathways are likely to be present. Natural England consider further assessment of impacts to Baston Fen SAC can be scoped out.

Nationally Designated Sites

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within any nearby SSSIs, and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The table below sets out the relevant nationally designated sites and whether we consider they should be scoped in or out of the ES (Table 2).

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
The Wash SSSI	The features of The Wash SSSI mirror those of the three European designations it also holds. In considering impacts to the European Site Features, the ES should consider impacts to the features of the SSSI.	See Table 1.
Nene Washes SSSI	The features of the Nene Washes SSSI mirror those of the three European designations it also holds. In considering impacts to the European Site Features, the ES should consider impacts to the features of the SSSI.	See Table 1.
Baston & Thurlby Fens SSSI	None	No Impact Risk Zones are triggered for this SSSI by the proposed development. Natural England advise that impacts to the features of Baston & Thurlby Fens SSSI are unlikely; further assessment in the ES can be scoped out.
Cowbit Wash SSSI	None	No Impact Risk Zones are triggered for this SSSI by the proposed development. Natural England concur with the conclusion of the scoping report that impacts to this SSSI can be scoped out of further assessment.

No Impact Risk Zones are triggered for the remaining SSSI's located within 15km of the proposed development (Deeping Gravel Pits SSSI, Eye Gravel Pits SSSI, Dogsthorpe Star Pit SSSI, Cross Drain SSSI, Dole Wood SSSI, Math and Elsea Wood SSSI, Horbling Fen SSSI, Langtoft Gravel Pits SSSI, Surfleet Lows SSSI, Bassenhally Pit SSSI, Adventurer's Land SSSI); as such, Natural England consider further assessment can be scoped out for these sites.

In addition to the above Nationally Designated Sites, Natural England have been in discussions with the applicant with regard to a nationally significant population of Crane known to be present in close proximity to the proposed development site. Natural England consider that assessment of impacts to this population from both bird strike and disturbance during construction and operation should be scoped into the ES.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group

or other local group and protected under the NPPF (para 180). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

5- Protected species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England will not make detailed comments on Protected Species elements of this project. Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. Applicants should check to see if a mitigation licence is required using NE guidance on licencing [NE wildlife licences](#). Natural England are unable to advise upon the need for a licence; this responsibility falls to the developer.

Where licence need is identified, applicants should make use of Natural England's [Pre Submission Screening Service](#), during the pre-application stages, for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) contains details of the LONI process.

6- Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or

priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

7- Ancient Woodland, ancient and veteran trees

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. This is reflected in NPS EN-1 paragraphs 5.4.14-15.

No Ancient Woodland is mapped in proximity to the proposed development, however, the ES should assess the impacts of the proposal on any ancient woodland or ancient and veteran trees identified, with the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement. Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

8- Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for Biodiversity Net Gain (BNG), with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.

Table 4.3 of the EIA Scoping report states that a Biodiversity Gain Plan will be produced to demonstrate the level of Net Gain 'in biodiversity habitat units' the development can deliver, with a target of at least 10%. Natural England welcome this and would encourage the applicant to commit to an excess of 10% Biodiversity Net Gain across habitat, river and hedgerow units, illustrated via the use of the statutory biodiversity metric.

In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site. Natural England also recommend consultation with the Lincolnshire Wildlife Trust, and any other local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed by the project.

In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to

the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. The ES should make clear the project's contribution to ecological connectivity in the area, the Nature Recovery Network and climate change resilience.

9- Landscape

Nationally designated landscapes

The development site is not within, or within proximity to, any nationally designated landscapes.

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

10- Connecting people with nature

The EIA Scoping Report Figure 2.2 shows the Public Rights of Way within and around the development site. The ES should consider potential impacts on access land, common land and public rights of way in line with NPPF paragraph 104 and NPS EN-1 paras 5.11.24 & 5.11.30. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species. Inclusion of interpretation boards and signage may also contribute to an enhanced enjoyment and understanding of the local environment and project. Relevant aspects of local authority green infrastructure strategies should also be incorporated where appropriate.

11- Soils and agricultural land quality

Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land.

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the [Natural England Guide to assessing development proposals on agricultural land](#).

Survey Scope

Table 4.5 of the EIA Scoping report sets out that to date, a reconnaissance level ALC survey has been undertaken at the site, and that following this, a more detailed survey will be undertaken with a density of 1 auger per 2ha, with infill points being surveyed where variation occurs, to confirm the land grade boundaries and identify soil and land types. Natural England advise that this more flexible approach to the ALC survey may be suitable in this instance (as opposed to the preferable 1 auger per ha density across the whole site), however, infill pits at a full detailed level (1 auger per 1 ha plus representative pits) would also be expected in all areas BMV land has been identified by the semi-detailed survey. We would also require a detailed ALC survey density for any proposed permanent infrastructure (i.e. substations, BESS & Access tracks).

It is noted that as yet, no survey of the cable route has been undertaken, and the scope of this will be determined in consultation with Natural England, which is welcomed.

Additional Scoping Advice

Natural England would provide the following further advice in relation to the ALC survey and consideration of soils and Best and Most Versatile Land within the ES:

The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The [British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction](#), which should be followed.

The ALC survey should also be used to inform the final design of the project and inform micro-siting of infrastructure such as the BESS to avoid BMV land. The ES should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan.

Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, Access tracks, BESS/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost.

The EIA Scoping report suggests that the lifetime of the development will be 40 years. Natural England note that it is unclear whether the DCO will specify a 40-year time limit. During the life of the proposed development it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited, the areas subject to a change in land use or land management (i.e. The land under the solar arrays and the land subject to habitat enhancement) have the potential to lead to the permanent reduction in the land's potential agricultural production.

Natural England also consider that commitment should be made through the DCO to reinstate all Best and Most Versatile Land back to its former ALC grade, following decommissioning.

12- Climate change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 180), which should be demonstrated through the ES.

From: [REDACTED]
To: [Meridian Solar Farm](#)
Cc: [REDACTED]
Subject: RE: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 04 June 2024 14:31:00
Attachments: [image004.jpg](#)
[image005.jpg](#)
[image006.png](#)
[image007.png](#)

You don't often get email from [REDACTED]@nelincs.gov.uk. [Learn why this is important](#)

Good afternoon,

I confirm on behalf of North East Lincolnshire that we have no comments to make.

Kind regards

Cheryl Jarvis FD, MSc, MRTPI
Development Manager
Development Management - Planning
Places & Communities – NEL
[\[REDACTED\]@nelincs.gov.uk](#)



equans.co.uk

Municipal Offices, Town Hall Square
Grimsby, North East Lincolnshire, DN31 1HU

From: Planning - IGE (Equans) <planning@nelincs.gov.uk>
Sent: Friday, May 31, 2024 1:44 PM
To: Martin Dixon (EQUANS) [REDACTED] <[\[REDACTED\]@nelincs.gov.uk](mailto:[REDACTED]@nelincs.gov.uk)>; Cheryl Jarvis (EQUANS) <[\[REDACTED\]@nelincs.gov.uk](mailto:[REDACTED]@nelincs.gov.uk)>
Subject: FW: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

Hi both,

For you

Megan Green
Business Support Assistant
Building Control/ Planning
Places & Communities North – NEL
[\[REDACTED\]@nelincs.gov.uk](#)



equans.co.uk

Ground Floor, Municipal Offices, Town Hall Square,
Grimsby, North East Lincolnshire, DN31 1HU.

From: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>
Sent: Friday, May 31, 2024 12:53 PM
To: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>
Cc: Meridian Solar Farm <MeridianSolar@planninginspectorate.gov.uk>
Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

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FAO head of Planning

Dear Sir / Madam

We are contacting you at this time in relation to the **Meridian Solar Farm** which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the pre-application stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) (“the EIA Regulations”), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant ‘consultation bodies’ defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES

by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is **28 June 2024** and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

- [Overview of the NSIP Planning Process](#)
- [Information on the stages, services and participation in NSIP planning](#)
- [FAQs relating to the Scoping process](#)
- [Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment \(HRA\), etc.](#)
- [Information on legislation, guidance, and National Policy Statements \(NPSs\)](#)

The relevant legal framework and regulations include:

- [The Planning Act 2008](#)
- [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations \(2017\)](#)
- [Infrastructure Planning \(Applications: Prescribed Forms and Procedure\) Regulations 2009](#)

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Kind regards,



Gary Chapman | EIA and Land Rights Advisor (HEO)
The Planning Inspectorate

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.

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[Please take a moment to review the Planning Inspectorate's Privacy Notice which can be accessed by clicking this link.](#)

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From: [REDACTED]
To: [Meridian Solar Farm](#)
Subject: EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 03 June 2024 15:18:46
Attachments: [image090263.png](#)
[image179837.png](#)
[image750476.png](#)
[image485537.png](#)
[image984955.jpg](#)

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Dear Sir, Madam

EN101069 – Meridian Solar Farm – EIA Scoping Notification and Consultation / Reg 11 Notification

Thank you for consulting North Kesteven District Council in relation to the EIA Scoping Report for the proposed Meridian Solar Farm.

At this stage the Council's response is framed around the chapter sub-headings of '3.6 Proposed Cumulative Assessment' and Section 4 'Agriculture and Soils'.

3.6 Proposed Cumulative Assessment

The Council agrees with the general approach set out in section 3.6 'Proposed Cumulative Assessment' starting with Stage 1 namely to establish the Zone of Influence (ZOI) to determine the RFFPs for consideration, however we do not agree with the Table 3.5 list of cumulative schemes as identified by the applicant. Whilst we note the caveat that the list will be kept under review with the relevant Authorities the list at Table 3.5 does not include any of the other solar (NSIP or TCPA 1990) registered/in examination/under consideration projects across North Kesteven District or the rest of the County. The proposed approach does not align with precedent from other NSIP solar projects across Lincolnshire, including those within North Kesteven District, nor the very recent Written Ministerial Statement (UIN HCWS466) issued on 15th May (<https://questions-statements.parliament.uk/written-statements/detail/2024-05-15/hcws466>).

The WMS specifically references Lincolnshire in the context of the potential cumulative effects associated with solar energy, food security and best and most versatile (BMV) land, noting that 'when considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality'. North Kesteven District Council therefore advises that the schedule of cumulative projects needs to be significantly expanded from Table 3.5 given the conclusions set out at table 4.5 namely that the initial findings of the reconnaissance level ALC survey have shown the land to be mainly of Subgrade 3a quality with areas of Grade 1, 2 (all BMV) and some Subgrade 3b. The Council would like to be involved in engaging with the applicant on the cumulative assessment of projects moving forward.

Section 4 'Agriculture and Soils'.

In addition to the above, table 4.5 should be expanded under the 'policy and guidance' section to include the two WMSs on solar and BMV land; including the aforementioned UIN HCWS466 issued on 15th May. In addition, the 'guidance' section of the same table should also include reference to the Natural England 'Agricultural Land Classification:

protecting the best and most versatile agricultural land (TIN049)'.
I hope that the above is of assistance,

Regards
Nick Feltham

-
-



Nick Feltham
Development Manager

Tel: [REDACTED]
[REDACTED]@N-KESTEVEN.GOV.UK
www.n-kesteven.gov.uk
Kesteven Street, Sleaford, NG34 7EF

How was your experience contacting us today? Tell us here.

A rectangular feedback form placeholder with a thin border, containing a small blue square icon with a white question mark in the center.

Officer: Matthew Gillyon

Tel: [REDACTED]

Email: [REDACTED]@northlincs.gov.uk

26/06/2024

Meridian Solar Farm Ltd
Floor 6,
St Magnus House,
3 Lower Thames Street,
London,
EC3R 6HD

North Lincolnshire Council

www.northlincs.gov.uk

Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

Planning Application Reference: EN010169

Application by Meridian Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the Meridian Solar Farm (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Officer: Matthew Gillyon

Thank you for your letter dated 31st may 2024 giving North Lincolnshire Council (NLC) the opportunity to comment on the Application by Meridian Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the Meridian Solar Farm (the Proposed Development).

I can confirm after consulting with consultees within North Lincolnshire Council, that no objections have been raised in respect of the proposal.

It is noted that our Historic Environment Record Office has commented that the applicants Scoping Report Cultural Heritage Baseline Development (p71) proposes desk-based research and a staged programme of archaeological evaluation as part of the assessment process. North Lincolnshire's HER support this process as necessary to inform an adequate heritage assessment and also recommend that the applicant follow the advice of the County Archaeologist for Lincolnshire to ensure a robust heritage assessment is prepared for the DCO application.

Kind Regards



Matthew Gillyon
Senior Planning Officer
North Lincolnshire Council

date: 28 June 2024
your reference: EN010169
our reference: PE-00281-24
ask for: Sam Dewar
email: [REDACTED]@dpaplanning.co.uk
DDI: [REDACTED]



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The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent by email to: meridiansolar@planninginspectorate.gov.uk

Proposal:

Statutory Scoping Consultation to South Holland District Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 prior to the submission of an application for the Meridian Solar Farm with associated infrastructure

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as lead officer on behalf of South Holland District Council) under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to carry out statutory consultation on the proposed application, including the EIA Scoping Report.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.

The applicant 'Meridian Solar Farm Ltd' intends to submit a Development Consent Order (DCO) application to the Secretary of State for Energy Security and Net Zero (SoS) for the proposed Meridian Solar Farm project, near Spalding. The proposed development would see the installation of ground mounted solar panels on land between River Welland and Sutton St. Edmund and extends across an area of approximately 1100 hectares in size.

The proposed development comprises the construction, operation (including maintenance) and decommissioning (removal) of a solar photovoltaic electricity generating facility with associated infrastructure including battery storage and an approximately 12km Grid Connection to National Grid's planned Weston Marsh substation. The total installed capacity of the proposal is to be up to 750MW (Mega Watts).

South Holland Planning Authority are a consultee as part of duty to consult (section 42 of the Planning Act 2008). For an inclusive and robust response an internal consultation process has also been undertaken, seeking internal responses from certain officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received to date. Responses after June 28th will be collated and sent on to the Applicant directly where it is hoped that will still be taken into account ahead of any formal submission.

List of Consultees

As part of the internal consultation process, the below 65 consultees were contacted for comment:

Internal:

1. Environmental Protection;
2. Planning Policy;
3. Conservation Assistant (Tree Preservation);
4. Conservation Officer (Heritage); and
5. Senior Ecologist.

Ward Members:

1. Councillor Sneath
2. Councillor Casson
3. Councillor Woolf
4. Councillor Alcock
5. Councillor Astill
6. Councillor Harrison
7. Councillor Bingham
8. Councillor Geaney
9. Councillor King
10. Councillor Barnes
11. Councillor Reynolds
12. Councillor Eldridge
13. Councillor Worth
14. Councillor Beal

15. Councillor Redgate
16. Councillor Hutchinson
17. Councillor Carter
18. Councillor Chapman
19. Councillor Tennant
20. Councillor Tyrrell
21. Councillor Wilkinson
22. Councillor Slade
23. Councillor Avery
24. Councillor Sneath
25. Councillor Taylor
26. Councillor Chauhan
27. Councillor Sheard
28. Councillor Hasan
29. Councillor Le Sage
30. Councillor Le Sage
31. Councillor Ashby
32. Councillor Gibson
33. Councillor Scalese
34. Councillor Whitbourn
35. Councillor Spencer
36. Councillor Brewis
37. Councillor Booth.

Parish Councils:

1. Crowland Parish Council
2. Deeping St Nicholas Parish Council
3. Cowbit Parish Council
4. Moulton Parish Council
5. Weston Parish Council
6. Donington Parish Council
7. Fleet Parish Council
8. Gedney Parish Council
9. Gedney Hill Parish Council
10. Gosberton Parish Council
11. Holbeach Parish Council
12. Little Sutton Parish Council
13. Long Sutton Parish Council
14. Lutton Parish Council
15. Moulton Parish Council
16. Pinchbeck Parish Council
17. Quadring Parish Council

18. Surfleet & Whaplode Parish Councils
19. Sutton Bridge Parish Council
20. Sutton St Edmund Parish Council
21. Sutton St James Parish Council
22. Tydd St Mary Parish Council
23. Weston Parish Council

The Proposal

The Scheme falls under Sections 14(1)(a) and 15(2) of the Planning Act 2008 (PA 2008)5, as an onshore generating station exceeding 50MW (Mega Watts). The Scheme therefore constitutes a Nationally Significant Infrastructure Project and requires a Development Consent Order application to the Secretary of State.

For context our understanding of the proposed development is for the installation of ground mounted solar panels with a total installed capacity of up to 750MW on land between River Welland and Sutton St. Edmund and extending across an area of approximately 1100 hectares in size.

A single rectangular panel can measure 2.5 metres by 1.3 metres in size and fixed at an angle facing southwards with a maximum height of 3.5 metres. A total installed capacity of 750MW would therefore see approximately 937,500 individual solar panels installed across the application site.

The proposed development comprises the construction, operation (including maintenance) and decommissioning (removal) of a solar photovoltaic electricity generating facility with associated infrastructure, including battery storage and an approximately 12km Grid Connection to National Grid's planned Weston Marsh substation. It has not yet been determined if the grid connection will be achieved with overhead or underground cables. If the grid connection is an overhead line it will use pylons at a height of potentially 57m, if the grid connection is underground this is to be installed via trenching at 1.5m wide and 1.2m deep, with further details yet to be refined.

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019.

The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.
- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.
- Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:
 - health and safety of the public;
 - the amenities of the area; or
 - the natural, historic and built environment;
 - by way of:
 - air quality, including fumes and odour;
 - noise including vibration;
 - light levels;
 - land quality and condition; or
 - surface and groundwater quality.
 - Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:
 - impact on the proposed development from poor air quality from identified sources;
 - impact on air quality from the proposed development; and

- impact on amenity from existing uses.
- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.
- Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.
- Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

The NPPF was originally implemented in 2012, with the most recent revision being 2019 and an update in 2023. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below:

- Paragraph 123 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Footnote 49 of the NPPF states except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.
- Paragraph 124 - Planning policies and decisions should:
 - a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

- Paragraph 157 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- Paragraph 165 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Paragraph 180 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

(The NPPF Glossary states : Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification).

- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations

South Holland District Council Planning Authority are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.

South Holland District Council do not have in house specialists or advisers for all topic areas covered by the EIA Scoping Report therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council. Terra Loci are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows:

Landscape Visual Impact (Terra Loci) – acting on behalf of the Council

Their response is detailed full in the body assessment of this report however is summarised here for completeness:

- The LVIA must be undertaken on a final, fixed cable route, defining which sections will be overhead and underground, and the necessary infrastructure at points where underground cable routes transition to overhead cable routes.

- ZTV analysis must be undertaken utilising the maximum parameters for the proposed buildings to accurately understand the extent of potential visibility. Furthermore, Figure 4.6.1 Draft Zone of Theoretical Visibility appears to take into account the screening effect of surface features such as trees; it is acknowledged that this can be useful to refine the ZTV, however this must be submitted alongside 'bare-earth' ZTV analysis in order to indicate the potential 'worst-case' scenario.
- The future baseline should also be defined to outline any reasonably foreseeable changes to the baseline scenario in the future, without the proposed development taking place, to understand the anticipated evolution of the baseline and any influence this may have over anticipated impacts.
- Visual receptors note residents and recreation users. Visual receptors should also include road users and any other receptors groups which may be affected.
- The landscape and visual receptors and representative viewpoints must be submitted and approved prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility analysis, as defined above, should also be provided to ensure that the proposed study area is sufficient.
- The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.
- All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.
- Locations for proposed 'photomontage' visualisations, including visualisation types, following TGN 06/19 should be submitted and approved prior to being undertaken.
- The assessment should refer to the relevant National Character Areas as published by Natural England.
- Cumulative impact assessment should include other proposals currently at Scoping stage and onwards.

Environmental Protection

No comment has been received during the consultation period.

Forward Planning (Planning Policy)

No comment has been received during the consultation period.

Conservation Assistant (Tree Preservation)

No comment has been received during the consultation period.

Conservation Officer (Heritage)

No comment has been received during the consultation period.

Parish Councils

No comment has been received during the consultation period.

Councillors

No comment has been received during the consultation period.

External Representations

An external representation has been received by South Holland District Council from Meridian Action Group. The Action Group are a third party to the proposed development and do not reflect the Councils position on the development however, for transparency and completeness their full response has been attached as an appendix to this response. The Planning Inspector has been informed of the representation received mainly as it is from an Action Group. We have already been informed by the Planning Inspectorate that they will only accept consultation responses from the identified consultation bodies under Regulation 3(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. We therefore advised the action group to send any response directly to the Applicant but that we would also include it in our response for information purposes only and again for transparency. Our understanding is that the Applicant is aware of the Action Group having already had engagement directly in the past during various consultation events.

External response of Meridian Action Group (summarised)

- Against the development in terms of scale and industrialisation of a predominantly rural area;
- Reducing ability of smaller scale renewables by taking grid capacity; and
- Lack of assessment regarding loss of agricultural land.

Review of the EIA Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward at this stage.

Air Quality

The Council's Environmental Health Officer has not yet responded, however the following comments are provided in relevance to the development at this stage:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's ; and
- Soil stockpiles should be sealed to recued fugitive dust emissions.

Archaeology and Cultural Heritage

No comments have been received from the Council's Archaeological and Cultural Heritage consultant, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council would expect a detailed landscape and visual assessment for any above ground features and for each to be looked at separately pending the final location and scale.
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Ecology

South Holland District Council do not have an in-house ecologist and the Wildlife Trust may have chosen to comment directly on the content of the consultation. However having reviewed the information put forward within the Scoping Report , the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the importance of achieving a 10% biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021. Lastly, temporary construction works can have a significant affect and we would therefore welcome a full scheme of remediation and reinstatement after these works have been undertaken.

Hydrology, Hydrogeology and Flood Risk

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer.

South Holland District Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below specific comments to offer:

- Soil management practices may need further evidence

Noise and Vibration

No comments have been received by the Council's Environmental Protection Officer but the following comments are provided:

- Please provide Council Environmental Protection with appropriate contact details in event of complaints.
- Ensure Council Environmental Protection Team & all relevant Noise sensitive receptors (NSR) in the immediate area are informed of any proposed works outside of normal working hours.
- Maintain sound barriers in good order.
- Vibration, ensure Council Environmental Protection Team and all Vibration Sensitive Receptors in immediate area are informed of operations

Traffic and Transport

Lincolnshire County Council act as highways authority Lincolnshire County Council act as Highway Authority and may comment directly to the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and but have the following comments to offer:

- One community liaison person in place for contact with any issues should they arise whilst works are being carried out;
- Consideration of the effect of mud on roads as well as the impact of large load vehicles on roads which are already in a poor state;
- Consideration of works traffic hours in relation to effects on local transport; and
- Construction compounds and field accesses in the countryside can have a significant affect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Agriculture and Soils

The council do not have a specific officer to deal with such matters however this topic area is of fundamental concern to the Council simply due to the amount of land that is associated

with the development. The NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other criteria) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. The Natural England provide extensive guidance on the matter and the Applicant is urged to follow this in their preparation of their work as it is acknowledged that this is effectively a desire to challenge the current agricultural classification of the site (please see <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>).

It is acknowledged that the Applicant has been engaging with Natural England which is clearly supported and we would recommend that this engagement continues further as we have concerns over the applied methodology to how soil resources and agricultural land quality will be reviewed. In particular there is an over reliance on a predominately desk top based assessment along with a fairly limited ‘initial reconnaissance ALC survey’ conducted at selected intersections of a single observation per 4 to 5 hectares and the proposed survey of a single observation per 1 or 2 hectares. Whilst it is appreciated this may give more detail to the current maps used for agricultural land classification, due to the works involved and the scale of land coverage it would be expected that this approach is justified further with the support of Natural England. We would welcome copies of any engagement that has happened with Natural England because the loss of high value and ‘best and most versatile’ agricultural land must be avoided unless there are exceptional circumstances provided.

Landscape and Visual Assessment

At this stage we do not have details of the final substation location, appearance or extent, however the information as provided in the Scoping Report has been reviewed by external consultants Terra Loci, with the following comments:

- Four potential routes are noted for the export cable utilising a combination of south-west, north-west, south-east and north-east export cable corridors. Export cables are anticipated to be either overhead, underground, or a combination of both. The export cable route and associated pylons or laying of underground cable have the potential to result in significant landscape and visual impacts. The LVIA must be undertaken on a final, fixed cable route, defining which sections will be overhead and underground, and the necessary infrastructure at points where underground cable routes transition to overhead cable routes. Alternatively, should the final cable route not be available at the time of assessment, appropriate assessment scenarios should be agreed for assessment to take place on all reasonably foreseeable export cable options.
- Figure 4.6.1 Draft Zone of Theoretical Visibility notes that building heights of 8m have been used for the ZTV, however paragraph 2.5.11 notes that switchgear will be housed in buildings up to 15m in height and paragraph 2.5.21 notes that substation buildings are anticipated to be approximately 15m in height. ZTV analysis must be

undertaken utilising the maximum parameters for the proposed buildings to accurately understand the extent of potential visibility. Furthermore, Figure 4.6.1 Draft Zone of Theoretical Visibility appears to take into account the screening effect of surface features such as trees; it is acknowledged that this can be useful to refine the ZTV, however this must be submitted alongside 'bare-earth' ZTV analysis in order to indicate the potential 'worst-case' scenario.

- Section 3.2.6 notes the EIA temporal scope as during construction, at a future year, over a 40 year period and during decommissioning. Table 4.6, heading Key Issues and Potential Likely Impacts notes that impacts are likely at the following phases: during construction, at year 1 of operation, at year 15 of operation and during decommissioning. Phases outlined within table 4.6 are appropriate for LVIA and should define the temporal scope of the LVIA.
- The future baseline should also be defined to outline any reasonably foreseeable changes to the baseline scenario in the future, without the proposed development taking place, to understand the anticipated evolution of the baseline and any influence this may have over anticipated impacts.
- Visual receptors note residents and recreation users. Visual receptors should also include road users and any other receptors groups which may be affected.
- The LVIA notes that Residential Visual Amenity Assessment is not proposed at this time but would be carried out if the LVIA indicates significant residual effects on residential receptors. This approach is considered to be appropriate.
- The landscape and visual receptors and representative viewpoints must be submitted and approved prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility analysis, as defined above, should also be provided to ensure that the proposed study area is sufficient.
- The full LVIA methodology, including factors and / or matrices used for determining sensitivity of landscape and visual receptors and magnitude and significance of effects should be submitted and approved prior to the assessment being undertaken.
- All visual representation with should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made. Locations for proposed 'photomontage' visualisations, including visualisation types, following TGN 06/19 should be submitted and approved prior to being undertaken.
- The assessment should refer to the relevant National Character Areas as published by Natural England. Local landscape character areas should be mapped at a scale

appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The LVIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies.

- In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, the LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.
- Cumulative impact assessment should include other proposals currently at Scoping stage and onwards. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a robust and inclusive response by giving all internal stakeholders the opportunity to comment that may not be fully aware of the proposals. Whilst some elements of the proposal are clear in its aims, others such as the extend of above ground structures and chosen cable routes and substation connection are still to be clarified. It is not until this time that the full effects on South Holland District Council can be fully appreciated and therefore commented upon. This response has focused on the Scoping Report only. It is only when the full EIA submission is made that comments on specific impacts will be made.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

Lastly, we have concerns over some methodology proposed in the scoping document, especially around 'Landscape and Visual Impact' and 'Agriculture and Soils'.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the Local Planning Authority upon the receipt of further information, whether during or before the submission of a full EIA planning application.

If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the Local planning Authority to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us.

Yours sincerely,

Sam Dewar
Consultant Planning Officer
[REDACTED]@dpaplanning.co.uk



Our ref: 24_27688_P

26/06/2024

Your ref: EN010169

Site name/Description: Land at Crowland and
Weston Marsh, South Lincolnshire

Summary of Proposal: Proposed solar farm,
cable connection corridors and grid connection
corridors

BY EMAIL ONLY

Dear Hannah Terry,

Thank you for consulting Water Management Alliance on the Environmental Impact Assessment (EIA) Scoping consultation for the proposed Meridian Solar Farm. This response is provided on behalf of our member, South Holland Internal Drainage Board (SHIDB), as the proposed development would be primarily located within the South Holland Internal Drainage District.

SHIDB has been aware of the proposed development prior to the current consultation, through direct engagement with the applicant and their agents. We intend to continue this engagement throughout the planning process to discuss matters within the IDB remit, i.e. consideration of flood risk and water management infrastructure.

SHIDB wish to provide the following comments relating to the scope of the EIA:

1. SHIDB strongly agrees that flood risk and hydrology should be scoped into the EIA, because of the relatively high flood risk across the entire area and because of the existing drainage network that is critical to protecting people, property, infrastructure and businesses in the area. There is an extensive network of drainage ditches (including main drains and ordinary watercourses) in this area. SHIDB is in discussion with the applicant over a proposed "Main Drain Model" that will underpin the Flood Risk Assessment. The assessment should consider the potential for flood risks to increase as a result of all of the different aspects of the proposed project, including (but are not necessarily restricted to) the construction of the photovoltaic area, the associated substation, transformers, storage areas, inter-array cable connections, and grid connection to Weston Marsh. Associated activities that should also be assessed include (but are not necessarily restricted to) construction of additional impermeable areas, temporary and permanent access roads, watercourse crossings, vegetation clearance works and earthworks, etc.).
2. Further, SHIDB strongly supports the development of a Drainage Strategy to set out how surface water from the development will be managed in relation to flood risk.

Duncan Worth (Chairman) Simon Bartlett (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The Anglian Water Authority (South Holland Internal Drainage District) Order 1974,
Statutory Instrument 1974 No.1209



3. It is noted that the Scoping Report states that “decommissioning of the Scheme is considered to have similar effects upon the water environment as those during the construction phase (Table 5.1, p. 158).” SHIDB requests clarification on whether such decommissioning effects would therefore be scoped in to the EIA; Table 5.1 appears to say that all decommissioning works are scoped out of the Flood Risk/Hydrology section of the EIA.

SHIDB would also like to highlight that works affecting watercourses (e.g. watercourse crossings, works within 9m of a watercourse, discharges to a watercourse) within the SH Internal Drainage District would require consent from the Board under the Land Drainage Act 1991 including the Board’s Byelaws, in a process separate from the Development Consent Order. The Board will liaise directly with the applicant in that process, and is likely to require further information (i.e. in addition to that provided in the EIA) to inform our decision-making for such consents.

Yours sincerely,

Judith Stoutt

Judith Stoutt
National Infrastructure Officer
Water Management Alliance



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN101069
Our Ref: 66081

Ms Hannah Terry
Senior Environmental Impact Assessment Advisor
The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

24th June 2024

Dear Ms Terry

**Nationally Significant Infrastructure Project
Meridian Solar Farm EN101069
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups, and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions, and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electric and Magnetic Fields

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF).

Recommendation

We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

1

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.