**SOUTH HOLLAND INTERNAL DRAINAGE BOARD**

**WRITTEN REPRESENTATION concerning MERIDIAN SOLAR FARM EN010169**

**22nd September 2026 (Deadline 1)**

1. This written representation is made by Water Management Alliance on behalf of South Holland Internal Drainage Board (SHIDB). SHIDB is a local public authority responsible for land drainage within the South Holland Internal Drainage District (SHIDD) in south-east Lincolnshire.

2. IDBs provide and maintain drainage systems to reduce flood risk to people and property, and to manage water levels for agricultural and environmental needs within their district. By engaging with the planning process, IDBs seek to reduce flood risks, promote sustainable development and reduce the potential for conflict between the planning process and the IDB's regulatory process. Each IDB has permissive powers to undertake water management activities within their Internal Drainage District. IDBs exercise a general power of supervision over all matters relating to water level management within their district whilst conducting their work in accordance with general environmental duties and promoting ecological wellbeing. IDB activities and responsibilities are controlled by the Land Drainage Act 1991 (LDA 1991) (as amended). IDBs regulate third party activities affecting water management through Byelaws under LDA 1991. IDBs are defined as Risk Management Authorities within the Flood & Water Management Act 2010 alongside the Environment Agency, local authorities and water companies.

3. This written representation is submitted to develop SHIDB's case, which was set out in the relevant representation [RR-211].

4. SHIDB's position is summarised in a draft Statement of Common Ground, which SHIDB understands the Applicant will submit to the Planning Authority at Deadline 1 of the examination. The majority of matters remain "under discussion". SHIDB will continue to attempt to resolve these matters via dialogue with the applicant. This dialogue includes negotiation on the wording of Protective Provisions set out for drainage authorities. These provisions (to be included in the DCO) will set out how SHIDB can influence design details relevant to IDB operations and effectiveness.

5. The key unresolved matter for SHIDB is the proposed minimum height of overhead lines. The Design Parameters document [APP-229] sets out that "a minimum clearance of 8.1m above open ground from the overhead electric line will be maintained" for the 400kV cables (works no. 9, 13, 14 and 15). It also shows "A

statutory minimum clearance of 6.7m above ground from the overhead electric line would be maintained" for 132kV cables (Work no.8). Whilst the Board acknowledges these minimum heights match or slightly exceed the statutory minimum heights, we emphasise that they do not account for the Board's need to operate long-reach excavators or similar, large machinery on the banks of arterial watercourses for maintenance (or emergency) works to maintain efficient land drainage. Machinery used by South Holland Internal Drainage Board is unusually large compared, for example, with other drainage boards in districts with smaller drainage assets. The presence of overhead electric lines at the proposed minimum heights would hinder or event prevent SHIDB from carrying out necessary operations at certain locations, because of electrical safety considerations. The Board therefore suggests the minimum cable heights should be agreed through negotiation with affected parties such as the Board, and based on bespoke requirements at particular locations, rather applying a standard minimum height for each voltage (132kV or 400kV) of overhead line. SHIDB is continuing to try to resolve this matter through dialogue with the Applicant.

6. SHIDB considers that the draft Statement of Common Ground provides an appropriate update to the Examining Authority on the Board's position in relation to the matters previously raised in the Board's Relevant Representation [RR-211]. This includes the matter of overhead line heights, discussed above, as well as watercourse crossings, SHIDB access to arterial watercourses and cable burial depths below watercourses. The Board is committed to negotiation with the Applicant to resolve the listed matters as far as possible.

7. The Board is actively engaging with the Applicant in relation to the Protective Provisions for South Holland Internal Drainage Board and separately in relation to the Project's impact on land owned by SHIDB.

End.