Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.16 Statement of Common Ground with Water Management Alliance on behalf of South Holland Internal Drainage Board

APFP Regulation 5(2)(q)

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

September 2026

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1. Introduction

1.1. Overview

1.1.1. This Statement of Common Ground (SoCG) has been prepared to support the examination process for the proposed Meridian Solar Farm. A DCO application has been made by Meridian Solar Farm Limited ('the Applicant') to the Secretary of State pursuant to Section 37 of the Planning Act 2008[1] which was accepted for examination by the Secretary of State pursuant to Section 55 of the Planning Act 2008 on 15 April 2026.

1.1.2. SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the examination. The purpose and possible content of SoCGs is detailed in the Ministry of Housing, Communities and Local Government's guidance entitled 'Planning Act 2008: Guidance on the examination stage of an application' (2026)[2], which states:

"*A SoCG is a written statement prepared jointly by the applicant and another interested party or parties but led and submitted by the applicant, setting out the factual matters about the application on which they agree, for example, on data or methodologies concerning the determination of any significant effects, but can just as helpfully record disagreement.*

…

SoCGs are expected to be concise and focused on the key issues, with the scope agreed between the parties from the outset of discussions on the application during the pre-application stage. SoCGs are often revised during the course of the examination as matters are agreed or disagreements clarified between the applicant and interested parties."

[1] The Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents [Accessed 11 August 2026]
[2] MHCLG (2026) Guidance Planning Act 2008: Guidance on the examination stage of an application. Available at: https://www.gov.uk/guidance/planning-act-2008-guidance-on-the-examination-stage-of-an-application [Accessed 2 September 2026]

1.1.3. This document relates to matters between the Applicant and the South Holland Internal Drainage Board (SHIDB), represented by the Water Management Alliance (WMA). It has been prepared jointly by the Applicant and SHIDB/WMA, and SHIDB/WMA has reviewed the Applicant's position as set out. It confirms to the Examining Authority where agreement has been reached between the parties, and where agreement has not (yet) been reached. This SoCG does not seek to replicate information that is available elsewhere, either within the DCO application and/or examination documents, referring out where appropriate.

1.1.4. The terminology used within the SoCG to reflect the status between the parties is either:

- "Agreed" to indicate where a matter has been resolved to the satisfaction of the parties.
- "Not Agreed" to indicate a final position where parties cannot agree.
- "Under Discussion" to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.

1.1.5. Where matters would require the involvement of third parties in order to come to an agreement, these dependencies are noted.

2. Record of Engagement

2.1. Summary of Engagement Undertaken

2.1.1. Table 2-1 summarises the key meetings and correspondence between the parties subject to this SoCG.

Table 2-1: Record of Engagement

Date	Form of Engagement	Details
May 2025	Stakeholder Event	SHIDB attended the Applicant's stakeholder event and provided initial comments on the proposed Scheme.
27 June 2025	Online Meeting	Meeting held at SHIDB's request to discuss the Scheme and give introductions.
June 2025	Consultation response	SHIDB responded in writing to the Applicant's statutory consultation.
October 2025 and February 2026	Consultation response	SHIDB responded to two additional targeted consultations.
20 October 2025	Online Meeting	Meeting held at SHIDB's request to discuss hydraulic modelling and the draft Drainage Strategy. SHIDB raised queries on the proposed drainage strategy; the Applicant's minutes of this meeting were shared with SHIDB and no comments were received.
December 2025	Email	Email from WMA requesting further information, shapefiles and schedules to review and requesting a meeting with the Applicant.
January 2026 onwards and ongoing	Emails and telephone calls	Engagement between the Applicant and WMA regarding Heads of Terms.
January 2026	Email	Follow-up email from WMA re-iterating requests from December 2025 email

Date	Form of Engagement	Details
March 2026	Email	The Applicant provided shapefiles, post submission of DCO Application, along with technical memo on overhead line clearances, crossing schedules and other relevant information requested by SHIDB.
April 2026	Email	Email from WMA responding to the Applicant's responses sent in March 2026, with further request from WMA for a meeting with the Applicant.
May 2026	Email	Email from Applicant with holding response
May 2026	Email	Email from WMA with further request for a meeting with all relevant disciplines and query whether the Applicant will provide a draft Statement of Common Ground. Email Response from Applicant and date agreed in July
July 2026	Email	Email from Applicant with proposed meeting dates and shapefiles
July 2026	Email	Email from WMA suggesting meeting agenda and providing comments on watercourse crossing schedule
30 July 2026	Online Meeting	Meeting between the Applicant and SHIDB/WMA to discuss watercourse crossings, access to arterial watercourses, overhead line clearances, cable burial depths, estates matters, protective provisions, cost recovery and future engagement.
September 2026	SoCG Preparation	First draft of this Statement of Common Ground prepared initially by the Applicant and subsequently with SHIDB/WMA input

3. Statement of Common Ground

3.1. Watercourse Crossings

Table 3-1: Areas of Discussion with SHIDB/WMA – Watercourse Crossings

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.1.1	Watercourse crossings — general approach	SHIDB considers that Meridian's proposals would significantly affect SHIDB because of the large number (>100) of locations within the Internal Drainage District (IDD) where proposed works will cross watercourses, by underground or overhead cables or by access roads. Each crossing, unless carefully designed, constructed, maintained and reinstated, could impact drainage efficiency and increase flood risk.	Watercourse Crossings are assessed within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1). An assessment for each water feature based on assumed reasonable worst-case parameters for a proposed structure is presented within Table 11-9 and Table 11-10 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). Mitigation has already been committed to on the design of culverts and on channel reinstatement, as set out within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) (see summary below) and secured through **OCEMP** (Table 3-7) (Doc Ref. 7.10 Rev 2). Paragraph 11.7.28 within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) states that "*The design of each crossing will be done post-DCO consent during the detailed design phase. Where culverts are required for*	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			watercourse crossings, the least impacting design that is reasonably practicable will be installed (e.g. arch rather than box culverts, and box culverts in preference to pipes etc.).” The Applicant does not consider it appropriate for the parties to progress detailed discussions on the design / approval of individual crossings now, as the final designs will remain subject to the detailed design process which follows the grant of consent. Instead, the Draft DCO already contains general protective provisions for the protection of drainage authorities at Schedule 13, Part 3, and the Applicant is engaging with SHIDB regarding where it requires further bespoke protective provisions specific to SHIDB. Both the general, and any bespoke protective provisions would secure a requirement for detailed designs for relevant watercourse crossings to be submitted to and approved by SHIDB before works are carried out. This ensures SHIDB will have input and final approval over crossing designs before implementation. They also include controls which provide SHIDB with final sign off of	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			works within its drainage infrastructure once constructed – and should works not be to SHIDB's satisfaction, the Applicant would have to amend those works.	
3.1.2	Culvert type and design	The Watercourse Crossing Schedule lists "culvert" or "bridge" crossings but does not include the type of culvert proposed at each location. SHIDB does not have confidence that the crossing structures will maintain the function of watercourses to enable effective removal of water and considers that Development Consent should not be granted whilst this information is lacking.	The final design and type of crossing structure at each location will be determined through detailed design and, where affecting SHIDB watercourses, will be subject to approval by SHIDB in accordance with the protective provisions. This means the Applicant will not be able to construct crossings without SHIDB's ultimate approval. This is consistent with standard DCO practice, whereby detailed designs for specified works are developed post-consent and approved by the relevant drainage authority before construction. However, to provide assurance as to the principles which will guide that detailed design post-consent, design principles for temporary and permanent culverts are set out within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2) and the **Design**	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			Parameters (Doc Ref. 7.4 Rev 2) respectively.	

3.2. Access to Arterial Watercourses

Table 3-2 Areas of Discussion with SHIDB/WMA – Access to Arterial Watercourses

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.2.1	Access to arterial watercourses	Some works could encroach within the Board's 9m access strips. SHIDB seeks commitment from the Applicant for regular, meaningful dialogue to identify and resolve potential access issues.	Any works affecting SHIDB drainage assets will be undertaken in accordance with the general protective provisions for the benefit of drainage authorities already included in the **Draft DCO** (Doc Ref. 3.1 Rev 2), or any alternative or amended bespoke protective provisions to be agreed with SHIDB. The general protective provisions in the draft DCO at Schedule 13, Part 3 already include a requirement at paragraph 26 that "*If by reason of construction of the specified work the drainage authority's access to land drainage infrastructure, flood defences or equipment maintained for flood defence purposes is materially obstructed, the undertaker must provide such alternative means of access that will allow the drainage authority to maintain the land drainage infrastructure, flood defence or use the equipment no less effectively than was possible before the obstruction*". ES Chapter 11 (Table 11-10) lists locations where temporary works may encroach	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			within the 9m buffer (based on the current indicative designs); any such encroachment would be agreed with SHIDB following detailed design. If those works impeded access, the Applicant would be required to put an alternative mean of access in place, further to the protective provisions as outlined above.	
3.2.2	Access to watercourses near proposed haul roads	Where temporary access is required for a 4-year period, this will be classified as permanent by SHIDB and will require relevant SHIDB specifications to be met	The haul road is proposed as a minimum 4m road, up to 8m, with a 21m corridor indicative to allow flexibility; any change to the haul road location would be within the Order Limits. Bellmouths would be gated, with haul roads only fenced if necessary (e.g. split landowners, open access land or livestock). The haul roads proposed are temporary and would be reinstated following construction. As set out in response to 3.2.1 above, if those works impeded access, the Applicant would be required to put an alternative mean of access in place, further to the protective provisions.	Under Discussion

3.3. Overhead Line Clearances

Table 3-3 Areas of Discussion with SHIDB/WMA – Overhead Line Clearances

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.3.1	Overhead line clearances — safety	If installed too low, overhead electricity lines pose a serious electrical safety hazard to Board operators using long-reach plant (up to 18m) during maintenance operations on watercourse banks. SHIDB requires a minimum of 7m clearance in addition to the machinery height and remains concerned about the Project's impact on its ability to safely conduct its functions at locations where arterial watercourses are crossed by overhead electrical lines.	The proposed overhead line has been designed in accordance with BS EN 50341-1 and BS EN 50341-2-9, led by NG TS 2.04 and ENA TS 43-125. A 9kV/m public ground exposure limit has been adopted per PS(T) 103 therefore a minimum ground clearance of 8.1m achieves compliance. The Applicant has adopted a conservative ground clearance of 8.5m to account for data inaccuracies between DTM/DSM and LiDAR that will be obtained in detailed design. At the meeting on 30 July 2026, the Applicant set out that the clearances requested by SHIDB (16m from 400kV pylons, 15m from 132kV poles, and a 16m horizontal clearance from the top of the bank) are more than twice the statutory requirement for 400kV lines (7.6m) which would result in considerably taller pylon structures across the route.	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			The Applicant further notes that HSE GS6 is guidance only. ENA TS 43-8 states that for 400kV lines the minimum clearance from live conductors is 3.1m, increasing to 5.3m should somebody be able to stand on top of the equipment below, which in this case is assumed not possible as it would be unsafe to stand on the top of working machinery. Therefore, this 3.1m clearance value leaves 5.4m below the live 400kV conductors for SHIDB to carry out any of their works with machinery. As HSE GS6 is guidance only, ENA TS 43-8 should be followed for working below live OHLs, as industry specification. Note that the Meridian 4SV OHL has greater clearance than 8.5m in most instances due to other influencing factors in the spans, therefore this 5.4m working area below the OHL will be greater in most instances. The Applicant notes that the 7m clearance above machinery height requested by SHIDB is greater than the applicable electrical clearance requirements for the 132kV inter-array overhead line. The minimum statutory ground clearance for a 132kV overhead line is 6.7m, as reflected in ENA TS 43-8. ENA TS	

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			43-8 also specifies a minimum clearance of 1.4m from live 132kV conductors where it is not possible for a person to stand on the equipment below. Therefore, the 7m additional clearance requested by SHIDB is not considered necessary to meet the applicable electrical clearance requirements. The Applicant further notes that HSE GS6 only relates to the live electrical parts of the infrastructure, not the physical pylons or foundations, and that in accordance with ENA's guidance on which GS6 is based, equipment can safely be up to 600mm from the pylons so long as the exclusion zone to live parts is not breached.	

3.4. Cable Burial Depths

Table 3-4 Areas of Discussion with SHIDB/WMA – Cable Burial Depths

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.4.1	Cable burial depth below arterial watercourses	SHIDB is likely to need to widen and/or deepen watercourses during the lifetime of the Scheme. SHIDB requires a minimum cable burial depth of 5m below key arterial watercourses (South Holland Main Drain) and 2.5m below other arterial (Board-maintained) watercourses.	The Applicant has updated the minimum underground cable burial depth from 3m to 5m below the South Holland Main Drain in the DCO Application documents submitted at Deadline 1. This is secured through the updated **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OCEMP** (Doc Ref. 7.10 Rev 2). This was confirmed as agreed by SHIDB at the meeting on 30 July 2026.	Agreed

3.5. Land and Legal Matters

Table 3-5 Areas of Discussion with SHIDB/WMA – Land and Legal Matters

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
3.5.1	Board-owned land and Heads of Terms	Agreement between SHIDB and the Applicant has not been reached regarding areas where proposed works affect Board-owned land. SHIDB has identified 20 watercourse crossing locations where the	The Applicant remains engaged with SHIDB around its interest, the Scheme and the works required to facilitate the Scheme. At the meeting on 30 July 2026, it was confirmed that SHIDB has appointed an	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
		Project will directly affect Board-owned land, and clarification is required regarding the nature and extent of other project works affecting Board-owned land. The Applicant is seeking agreement with SHIDB in relation to over 150 land parcels. Whilst this lack of clarity exists, SHIDB is unable to progress Heads of Terms requested by the Applicant for the affected land parcels.	external agent to negotiate Heads of Terms, and that additional detail on the extent of proposed works and access arrangements would assist ongoing discussions. The Applicant agreed to pick this up with its land agents and consider what additional information could be provided to support those discussions.	
3.5.2	Protective Provisions and disapplication of the Land Drainage Act 1991	Should SHIDB's concerns be satisfactorily resolved, SHIDB is supportive of the Applicant's proposal to disapply certain sections of the Land Drainage Act 1991, so long as the DCO includes acceptable Protective Provisions for drainage authorities, ensuring SHIDB is granted sufficient opportunity to consider and influence detailed design, set conditions on works, and that the Applicant's maintenance responsibilities are set out. SHIDB is undertaking a legal review of the draft Protective Provisions and will seek to agree satisfactory wording with the Applicant, aiming to complete this before the end of the examination.	The Applicant welcomes SHIDB's acknowledgement that the proposed disapplication of relevant provisions of the Land Drainage Act 1991 can be appropriately addressed through protective provisions. As noted above, the Draft DCO already includes general protective provisions for drainage authorities at Schedule 13, Part 3, and the Applicant and is continuing to engage proactively with SHIDB regarding the drafting of bespoke protective provisions for its benefit. At the meeting on 30 July 2026, it was noted that SHIDB's legal advisers had provided comments on the draft protective provisions. The Applicant's legal team	Under Discussion

Ref	Matter	Stakeholder Position	Meridian Solar Farm Position	Status
			returned comments on those protective provisions on 19 August. The Applicant is awaiting response from SHIDB's legal advisers.	

4. Signatures

4.1.1. This SoCG is agreed between the following:

Duly authorised for and on behalf of Meridian Solar Farm, the Applicant	Name Job Title Date Signature
Duly authorised for and on behalf of South Holland Internal Drainage Board / Water Management Alliance	Name Job Title Date Signature