Meridian Solar Farm

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Post-Submission Application Documents

8.28 Written Summary of Oral Submissions at ISH1

APFP Regulation 5(2)(q)

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

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1. Introduction

1.1.1. This note summarises the oral submissions made by Meridian Solar Farm Ltd (the 'Applicant') at Issue Specific Hearing 1 ('ISH1') held on 9 September 2026 in relation to the Meridian Solar Farm (the 'Scheme').

1.1.2. This note does not purport to summarise the oral submissions of other parties. Summaries of submissions made by other parties are only included where necessary to give context to the Applicant's submissions, or where the Applicant agreed with the submission(s) made and so made no further submissions (this is noted within this document where relevant).

1.1.3. The structure of this note follows the order of the items listed in the **Agenda for Issue Specific Hearing 1 (ISH1)** [EV3-001] (the 'Agenda'). Numbered agenda items referred to are references to the numbered items in the Agenda. The Applicant's substantive oral submissions commenced at Item 4 of the Agenda.

1.1.4. During the hearing, the ExA amended the order of the Agenda to accommodate the availability of the EA. Item 7 (Flood Risk, Water Quality and Resources) was brought forward and heard after Item 4. This approach has also been adopted in this note.

2. Written Summary of the Applicant's Oral Submissions

Agenda item no.	Agenda item	Written summary of the Applicant's oral submissions
Discussion points		
4	**Scope of the proposed development**	<u>**Proposed Development**</u> The ExA asked the Applicant to provide an overview of the Scheme, including the proposed solar array, Grid Connection Route, siting of new substations and battery energy storage system (BESS), cable sealing end compounds, and the main construction compounds, the approach to limits of deviation, and an overview of where overhead lines over underground cabling are proposed. Taylor Power, Managing Senior Associate at Pinsent Masons LLP, appearing on behalf of the Applicant, referred to **ES Figure 1-1: Scheme Location** [APP-071] in order to provid an overview of the Scheme. Ms Power stated that the Scheme is located in south-east Lincolnshire and comprises of a solar photovoltaic generating station located across four land parcels (Parcels A, B, C and D) in the pink hatch. Ms Power explained that there are two 132kV Inter-Array Connections. The Underground Inter Array Connection is an underground cable, connecting Parcels A & B. The Overhead Inter-Array Connection is an overhead line on double "H-Frame" wooden poles, connecting Parcels C & D. Ms Power described the Grid Connection Route, which extends between the on-site 400kV substation at the north of Parcel B and a siting area near Weston Marsh, coinciding with the indicative siting area for a future substation to be delivered by National Grid Electricity Transmission (NGET). Ms Power explained that the Grid Connection Route would predominantly be delivered by overhead line using steel lattice pylons, with a short section in the middle of the route to be undergrounded beneath existing electricity network infrastructure. <u>Solar Development Area</u> Ms Power described the solar development area. She explained that the solar PV arrays would comprise rows of south-facing panels mounted on steel support structures, with the final layout subject to detailed

		design within the parameters secured by the DCO. Ms Power noted, as set out in Table 2-1: Summary of Scheme Design Parameters and Principles on page 17 of **6.1 ES Chapter 2: The Scheme ES Chapter 2: The Scheme (Rev 1)** [AS-017] that the maximum height of the solar PV arrays would be 4.3m above ground level, with the lower edges of the panels positioned a minimum of 0.8m above ground level and raised where necessary to respond to flood risk requirements. Ms Power referred to the **Indicative and Illustrative Layout Plans and Sections - Section A Solar Development Area [APP-018]** , which showed the proposed arrangement of the Site, including the rows of solar PV panels. She explained that the layout shown is indicative and remains subject to detailed design within the broad development areas secured by the **Works Plans [**APP-009 **and** APP-010**].** Ms Power also explained that the Solar Development Area includes one on-site 400kV substation and BESS compound, together with three 132kV substations. She noted that the 132kV substations are located in Parcel A, to connect Parcel A to the Underground Inter-Array Connection; Parcel C, to connect Parcels B and C to the Overhead Inter-Array Connection; and Parcel D, to connect Parcel D to the Overhead Inter-Array Connection. Ms Power explained that the 132kV substations would collect electricity generated across the Solar Development Area and transfer it to the on-site 400kV substation via underground cabling. Ms Power noted that the proposed 400kV substation would be air-insulated rather than gas-insulated, and the overall compound would include both the substation and BESS units. Ms Power referred to the illustrative images of the proposed substation and BESS compound contained within **ES Chapter 2: The Scheme (Rev 1)** [AS-017] on page 32, at Plate 2-6: Illustrative BESS Unit. Ms Power explained that the on-site 400kV substation would then facilitate export of electricity to the National Grid transmission network, as described at paragraph 2.6.23 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]**.** She noted that the location of the 400kV substation in Parcel B was driven by the routing process for the Grid Connection Route with the outcome of that process being that the route into Parcel B was preferred over Parcel D.

		Ms Power also explained that the BESS compound would be co-located with the 400kV substation. She noted that the Scheme has been assessed on the basis of a BESS with a capacity of up to 350MW and up to two hours' storage duration, as detailed at paragraph 2.6.16 of ES Chapter 2: The Scheme (Rev 1) [AS-017]. Ms Power explained that the BESS would provide operational flexibility through energy storage and grid balancing functions. Ms Power explained that both the substations and the BESS compound had been positioned having regard to the Horlock Rules, as well as technical requirements, flood risk constraints, environmental considerations and the connection requirements associated with the wider Scheme. She noted that embedded flood protection measures form part of the design, including bunding or flood defence walls, where necessary. Ms Power further explained that the illustrative design for the Solar Development Area incorporates substantial areas of retained and enhanced green infrastructure, including over 170 hectares of habitat management areas, landscape corridors (as detailed at paragraph 9.7.10 of **ES Chapter 9: Ecology and Biodiversity (Doc Ref 6.1 Rev 1**)), 129 hectares of species-rich grassland and other planting, as described at paragraph 2.9.30 on page 53 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]. Ms Power described the illustrative construction strategy, which assumes the provision of construction compounds within each of the principal land parcels. She explained that, for assessment purposes, the final layout and location of construction compounds within the Solar Development Area remains flexible and will ultimately be determined through the detailed design process. Ms Power noted that construction compounds within the Solar Development Area are authorised as ancillary works under Work No. 5, and so can be located anywhere within the Solar Development Area, where the Work No. 5 hatching is shown. <u>Inter-Array Connection</u> Ms Power then described the Underground Inter-Array Connection, explaining that it comprises an underground cable extending from the 132kV substation in Parcel A to both the 132kV substation in Parcel B and the on-site 400kV substation in Parcel B. She noted that the Underground Inter-Array Connection has a total length of approximately 1.1km as detailed at page 37, paragraph 2.7.1 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]. Ms Power explained that the cable would typically be buried at depths of

		between 0.9m and 2m below ground level. She further explained that, at trenchless crossings, the cable could be installed at depths of up to 7m below ground level, with a minimum depth of 3m where crossing beneath watercourses, as detailed at page 37, paragraph 2.6.38 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]. Ms Power described the Overhead Inter-Array Connection, explaining that it comprises an overhead line mounted on double "H-frame" wooden poles extending between the 132kV substation in Parcel C and the 132kV substation in Parcel D as shown on page 39, Plate 2-9: Illustrative 132kV Overhead Line Designs of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]. She noted that as the total length is approximately 3.1km, it also qualifies as a Nationally Significant Infrastructure Project (NSIP) length electricity network infrastructure, as defined within the Planning Act 2008. Ms Power explained that the overhead line would be up to 15m in height and would maintain a minimum ground clearance of 6.7m as detailed at page 38, paragraph 2.7.6 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017]. <u>Grid Connection Route</u> Ms Power then described the Grid Connection Route, as detailed at page 39 of **ES Chapter 2: The Scheme (Rev 1)** [AS-017], explaining that it would connect the on-site 400kV substation within Parcel B to NGET's proposed Weston Marsh B Substation near Weston Marsh. She noted that the Grid Connection Route extends for up to approximately 13km and would comprise predominantly a single-circuit 400kV overhead line supported by steel lattice pylons. Ms Power explained that the route runs broadly northwards from the on-site 400kV substation, crossing Moulton Chapel Road, Delgate Bank, B1165 Austendike Road and the A151 High Road before connecting into the proposed Weston Marsh B Substation. Ms Power explained that the pylons would generally be spaced at intervals of approximately 350m, although the final span lengths would be determined through detailed design. She noted that the overhead line has been designed with sufficient flexibility to coordinate with NGET's Grimsby to Walpole (G2W) project and other existing and proposed transmission infrastructure in the area. Ms Power also explained that two Cable Sealing End Compounds (CSECs) are proposed along the Grid Connection Route. She noted that the CSECs are required where the Grid Connection Route transitions between overhead line and underground cable configurations to cross an existing 132kV overhead line.

		Referring to page 42, Plate 2-11: Illustrative CSEC of **ES Chapter 2: The Scheme (Rev 1)** [AS-017], Ms Power explained the general appearance of a Cable Sealing End Compound (CSEC). She noted that the image was illustrative and represented a larger arrangement than would be required for the Scheme. Ms Power explained that the CSECs proposed as part of the Scheme would be approximately half the size of the example shown in the image. Ms Power explained that each CSEC could include infrastructure such as terminal pylons, gantries, cable sealing ends, surge arresters, earthing systems and associated electrical equipment. She noted that the compounds have been assessed on the basis of a maximum footprint of 46m by 46m. Ms Power further explained that the southern CSEC would incorporate flood protection measures. **Limits of Deviation** Ms Power then addressed the limits of deviation proposed for the Scheme. She explained that the Applicant has applied limits of deviation and the Rochdale Envelope approach, consistent with Planning Inspectorate Advice Note 9, in order to provide an appropriate degree of flexibility for the detailed design, construction and delivery of the Scheme, whilst ensuring that the environmental effects assessed within the Environmental Statement represent a realistic worst-case scenario. Ms Power noted that limits of deviation are a standard feature of NSIPs and are routinely used to accommodate design development whilst maintaining the assessed environmental envelope. She explained that the nature of the limits of deviation proposed for the Scheme is consistent with those adopted on previous solar and overhead line NSIPs. Referring to **ES Chapter 2: The Scheme (Rev 1)** [AS-017], Ms Power explained that the Scheme's consent envelope is defined through the limits of deviation secured by Article 6 of the **Draft DCO (Doc Ref 3.1 Rev 2)** and the **Design Parameters (Doc Ref 7.4 Rev 2).** Ms Power further explained that the limits of deviation for the authorised development are controlled through two key articles and a requirement within the Draft DCO **(Doc Ref 3.1 Rev 2)**.

		Ms Power explained that Article 3 is the primary article which enables development under the Order. She outlined that it sets the ultimate "limits of deviation" for the Scheme, namely the Order Limits. Ms Power further noted that it provides that all the numbered works comprising the authorised development in Schedule 1 must be situated within the marked areas shown on the Works Plans. She stated that this is the standard approach for made DCOs and provides effective limits of deviation within which each work must occur. Ms Power then addressed Article 6, explaining that it concerns the lateral, or horizontal, deviation of the overhead electric lines situated in the Grid Connection Route and the Overhead Inter-Array Connection. She clarified that any horizontal deviation can only occur within the limits of deviation shown on the Works Plans and that limits of vertical deviation, being the maximum or minimum height limits, are instead controlled by the **Design Parameters (Doc Ref 7.4 Rev 2)**. Ms Power went on to explain that the application of those two articles is clarified in Article 1, sub-paragraphs (5), (6) and (7). She noted that sub-paragraph (5) shows that the pylon identification numbers, and their spacing and locations as set out within the **Works Plans [APP-009] and [APP-010]**, are indicative only and may be varied within the limits of deviation on the Works Plans and in accordance with **the Design Parameters (Doc Ref 7.4 Rev 2)**. Ms Power highlighted that sub-paragraph (6) specifies that heights and depths are measured from the proposed final ground level and that maximum parameters are governed by the **Design Parameters (Doc Ref 7.4 Rev 2)**. Ms Power further explained that sub-paragraph (7) confirms the interactions between the work numbers comprising the authorised development and the Works Plans. Finally, Ms Power referred the ExA to Requirement 5 in Schedule 2, noting that it provides that the details submitted for final detailed design approval by the relevant planning authority must accord with the Design Parameters. <u>Works Plans – Solar Development Area</u> Ms Power then referred the ExA to the **Works Plans [APP-009]** sheet 5 of 12 to illustrate how the limits of deviation apply to the different works comprising the authorised development.

		In relation to Work No. 1 (shown in blue), Ms Power explained that this identifies the areas within which solar panels may be located. She noted that the final layout of the solar arrays remains subject to detailed design and will depend on the size and nature of the photovoltaic technology available at the time of procurement. Ms Power stated that, notwithstanding this flexibility, the final design must remain within the Design Parameters **(Doc Ref 7.4 Rev 2)**, including the relevant height and other dimensional controls. She further explained that the uneven boundaries of Work No. 1 reflect the avoidance of Flood Zone 3b within the Site. Turning to Work No. 3B (shown in red), Ms Power explained that this relates to one of the proposed 132kV substations. She noted that the maximum footprint of the substation would be controlled through the Design Parameters and would not occupy the entirety of the area shown on the Works Plans. The red box instead identifies the area within which the substation may be located. Ms Power then addressed Work No. 4 (shown as the blue dashed line extending northwards), which comprises the Underground Inter-Array Connection. She explained that this connection links the 132kV substations in Parcels A and C and also connects into the on-site 400kV substation. Ms Power noted that no centreline is shown for the underground cable because it may be installed anywhere within the limits of deviation shown by the blue dashed corridor, with the final routing to be determined through detailed design. In relation to Work No. 5, Ms Power explained that this comprises the hatched areas overlapping much of the Solar Development Area and captures ancillary infrastructure and works associated with the Scheme. She noted that these areas provide for works such as cabling between panels, solar stations, access tracks, landscaping, drainage works and construction compounds. Ms Power explained that, although these elements are broadly authorised under Work No. 5, their location and design remain subject to controls contained within the Design Parameters and other control documents. By way of example, she noted that the **Outline Construction Environmental Management Plan (Doc Ref 7.10 Rev 2)** places constraints on the location of construction compounds. Ms Power emphasised that, whilst Work No. 5 provides broad flexibility, the detailed location of infrastructure remains controlled by other elements of the consent framework.

		Turning to Work No. 7, Ms Power explained that these areas are designated for habitat management only. Unlike Work No. 5, they do not overlap with other works and instead identify land set aside for habitat management purposes. Ms Power noted that the function of each habitat management area is described within the **Outline Landscape and Ecology Management Plan (Doc Ref 7.16 Rev 1)**. She stated that the Work No. 7 areas include locations containing on-site Scheduled Monuments. She explained that arable use of these areas would continue but would be subject to management measures, including skylark plots, to enhance their value for ground-nesting birds. Ms Power also noted that the Work No. 7 areas include land through which the proposed permissive path would be routed. Finally, Ms Power addressed Work No. 8 (shown as the purple dashed corridor extending from the substation towards the edge of the sheet), which identifies the limits of deviation for the Overhead Inter-Array Connection. She noted that the Works Plans show an indicative centreline and indicative locations for the wooden poles, but these are not fixed and may move within the limits of deviation. Ms Power explained that a 15m working width has been assumed on either side of the overhead line alignment for access and material laydown, creating a 30m working corridor. She further noted that the Works Plans provide a 50m limit of deviation on either side of that working width. Ms Power explained that the alignment of the overhead line has been positioned close to the site boundary in this location in order to maintain separation from a residential property situated within the centre of the Scheme and to avoid unnecessary encroachment into the adjoining field, where only limited infrastructure such as cabling or access tracks may be required. <u>Works Plans – Grid Connection Route</u> Ms Power then referred the ExA to the **Works Plans – Section B Grid Connection Route [APP-010]** to demonstrate different types of infrastructure and the corresponding limits of deviation. Referring to Work No. 9 (shown in orange), Ms Power explained that this relates to the overhead line connection between the on-site 400kV substation and the Southern Cable Sealing End Compound. She noted that the orange shaded areas identify the areas within which construction and ancillary works associated with the overhead line may take place, including activities such as stringing positions. Ms Power contrasted this with the yellow dashed line shown on the Works Plans, explaining that this identifies the limits of deviation for the final overhead line alignment and pylon locations.

		Ms Power explained purple on these Works Plans indicates the pylon route, with the indicative pylon locations and numbers, however, she states this can change depending on the final detailed design layout. She highlighted that the blue hatching represents access and the green dotted hatching represents one of the construction compounds within the grid connection route. Turning to the CSEC, Ms Power referred to the Southern Cable Sealing End Compound (Work No. 10) and the Northern Cable Sealing End Compound (Work No. 12). She explained that the location and extent of these compounds are further constrained by the maximum footprints prescribed in the Design Parameters. Ms Power also noted that the underground cable connection between the two compounds may be routed within the approved limits of deviation as required by the final design. Ms Power then referred to Sheet 4 of the **Works Plans – Section B Grid Connection Route [APP-010].** She explained that Work No. 13 comprises the overhead electric line and operates in the same way as Work No. 9. Ms Power stated that Sheet 4 shows Work No. 13 crossing the A151 before entering Work No. 14. She noted that this area of flexibility has been retained at the northern end of the Grid Connection Route because the final location of NGET's proposed Weston Marsh B Substation, together with the detailed design of NGET's G2W and Weston Marsh to East Leicestershire (WMEL) projects, remains subject to further development and the future submission of those applications. Ms Power explained that flexibility has therefore been retained to allow for either overhead or underground connection solutions, together with alternative routing options where necessary to coordinate with NGET's emerging infrastructure. She noted that the final overhead line alignment in this area must remain within the yellow dashed limits of deviation shown on the Works Plans, whereas the wider work areas extend to field boundaries and identify where ancillary works, such as stringing operations, may take place. Ms Power added that the flexibility retained within Work No. 14 would also allow CSEC(s) to be located within this area should the overhead line need to be brought underground. Referring to the purple line on the Works Plans, Ms Power explained that this identifies the Applicant's preferred alignment. She stated that this alignment was developed in 2025 in an attempt to identify a

		route capable of integrating with the emerging NGET projects. However, Ms Power noted that the Applicant is currently unable to commit to a particular routing solution in this area because the final design remains dependent upon the routing and engagement with NGET, which has not been forthcoming at this time to provide certainty for the Applicant that it could, for example, exclude the western section of the siting area or commit only to overhead or only to underground connections, for example. Ms Power stated that she did not propose to go into further detail at that stage, noting that the ExA had requested further clarification on the design of this area in its **Procedural Decision dated 23 July 2026** [PD-005] and that the Applicant was preparing a response for submission at Deadline 1 in its **Connection to the National Grid Weston Marsh Substation Note** (Doc Ref. 8.24). Ms Power then referred to the **Design Parameters** [AS-022] and explained that they are aligned with the individual work numbers, setting out the controls applicable to each element of the authorised development. She noted that the Design Parameters include controls such as maximum heights for solar panels, maximum heights for overhead lines, maximum footprints for substations and the BESS, and maximum footprints for overhead line pylons and CSEC. In conclusion, Ms Power stated that the Applicant's position is that the proposed limits of deviation and associated design flexibility are both necessary and proportionate. She explained that they provide sufficient flexibility to enable detailed design, respond to site-specific constraints and accommodate interactions with third-party infrastructure, whilst ensuring that the Scheme remains within the environmental envelope assessed as part of the DCO Application. Ms Power noted that detailed design approval is subsequently controlled through Requirement 5 of Schedule 2 to the **Draft DCO (Rev 1)** [AS-011]. <u>Comparison: Overhead Electric Line and Underground Cabling</u> Carly Vince, Senior Director at Quod, appearing on behalf of the Applicant, provided a summary of the assessment of overhead line and underground cable options as set out in **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and the **Design Approach Document** [APP-268].

		Ms Vince explained that the starting point for the Applicant's design approach had been the policy position set out in paragraph 2.9.21 of NPS EN-5[1], which states that overhead lines should generally be the strong starting presumption for electricity network infrastructure. She noted that this presumption is reversed where proposed developments pass through a National Park, National Landscape or The Broads. Ms Vince stated that there are no such designations within or near the Scheme, with the nearest such designation located approximately 25km to the north-east of the Site. Ms Vince further noted that paragraph 2.9.14 of NPS EN-5 provides that, where there is a high potential for widespread and significant adverse landscape and visual impacts, the Secretary of State must weigh the feasibility, costs and environmental impacts of undergrounding against the adverse effects of an overhead line solution. She explained that the Applicant and its design team had undertaken an iterative comparison of overhead line and underground cable options. Referring to the **Planning Statement** [APP-260], Ms Vince stated that the Applicant's conclusion was that, whilst some significant adverse landscape and visual effects arise from the Grid Connection Route and the Overhead Inter-Array Connection, those effects are generally typical of overhead line infrastructure and do not trigger a requirement to demonstrate due consideration of the costs and benefits of feasible alternatives to the overhead line. Ms Vince explained that the Grid Connection Route has been designed as an overhead line, with the route identified and refined having regard to the Holford Rules, environmental constraints, consultation feedback and coordination with NGET's G2W project. Ms Vince explained that the Applicant had incorporated targeted undergrounding where justified by site-specific circumstances. She noted that a short underground section is proposed where the Grid

[1] National Policy Statement for electricity networks infrastructure (EN-5), 2025. Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5-2025. [Accessed 14/09/26].

		Connection Route crosses an existing 132kV overhead line and where oversailing that infrastructure was determined to be technically unfeasible, with CSECs facilitating the transition. Ms Vince further explained that the Underground Inter-Array Connection has been routed underground in the vicinity of Crowland Airfield and the Peterborough and Spalding Gliding Club in response to consultation feedback and aviation safety considerations. In conclusion, Ms Vince stated that the Applicant's approach had been to use overhead lines as the primary connection solution, consistent with national policy and the engineering requirements of the Scheme, whilst adopting underground cabling in specific locations where site-specific safety, technical or operational constraints justified a departure from that approach. <u>Comments from Other Parties</u> Sir John Hayes expressed concerns regarding the level of design flexibility sought by the Applicant, the lack of certainty regarding grid connection arrangements and coordination with other projects, the adequacy of stakeholder engagement and consultation, the consideration of alternatives, loss of agricultural land, and the potential environmental effects of the Scheme, including impacts on birds and water-related matters. ***Post-hearing Note:*** *The Applicant responded to concerns raised by Sir John Hayes in relation to alternatives, loss of agricultural land, and the potential environmental effects of the Scheme, including impacts on birds and water-related matters in its response to Agenda Items 4 (page 18), 5 (page 40), 7 (page 29), 8 (page 49) and 9 (page 51).* Howard Bassford, Partner at DLA LLP, appearing on behalf of NGET, noted that the Applicant does not currently hold a final, Gate 2 connection offer for the substation locations and expressed that NGET is not currently able to confirm that the Applicant's proposed infrastructure and physical works can be accommodated alongside NGET's emerging infrastructure proposals. Joel Semakula, barrister, appearing on behalf of Lincolnshire County Council (LCC), raised concerns regarding uncertainty over the Applicant's grid connection arrangements, and queried if these could be

		resolved by a requirement to restrict build out of the grid connection until a Gate 1 offer had been received. He also raised concerns regarding the Applicant's Landscape and Visual Impact Assessment, noting in particular the decision to adopt an overhead electric line grid connection rather than an underground cable, but stated that these LVIA concerns would be set out in full in written submissions. Ms Power responded to the points raised regarding grid connection certainty. She explained that the development of the Scheme has been iterative and has taken place during a period of significant change within the electricity connection regime. Ms Power noted that a number of energy and, indeed solar NSIPs, which hold Gate 1 solar or BESS offers, have proceeded t DCO application and examination. Ms Power clarified that the Applicant continues to hold a Gate 1 offer which refers to a grid connection at Weston Marsh and that it is on that basis and on the basis of the previous connection agreement (which the Applicant held prior to the NESO reform process) that the Applicant has designed and progressed its grid connection. Acknowledging that a Gate 1 offer does not provide certainty as to the Scheme's connection to the grid and relies upon the future application and award of a Gate 2 offer, Ms Power stated that the Applicant will seek a Gate 2 offer when the relevant application window opens, but that no such application window has yet been available. Ms Power also explained that although it is NGET's position to not to engage with applicants holding Gate 1 offers, the Applicant contends that this position, whereby NGET suggests promoters should pause DCO applications until a final connection offer is secured, is not supported by national policy and therefore not a position that the Applicant must accept. Ms Power emphasised the position set out at paragraph 4.11.6 of National Policy Statement (NPS) EN-1[2] which states that: "*Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible*." This policy explicitly recognises a scenario like that of the Scheme in which the Applicant has brought forward a grid

[2] Overarching National Policy Statement for energy (EN-1), 2025. Available at: Overarching National Policy Statement for energy (EN-1), 2025 - GOV.UK [Accessed 14.09.26].

		connection it considers is feasible, but which is not yet subject to a final formal grid connection offer. Further, Ms Power referred to the NESO Gate 2 Criteria Methodology which is the criteria used by NESO to rank and judge applications for Gate 2 offers. This criteria sets out that evidence of submission and validation of the planning application will improve a queue position, which, in turn, directly improves the likelihood of obtaining a Gate 2 offer in future windows. This supports the position that NESO envisages projects with Gate 1 offers (or no offers to date) proceeding with planning applications in advance of submitting a Gate 2 application. In response to suggestions that an new requirement should be included within the DCO to restrict commencement until the Applicant has greater certainty over its grid connection, Ms Power noted that while the Applicant would be willing to continue discussions with LCC in respect of any suggestions relating to DCO drafting, such a requirement was unnecessary, given the Applicant would not proceed to a final investment decision on the construction of a grid connection corridor if it did not have certainty as to its feasibility for connection. Further, including such a requirement now may have unintended consequences if not appropriately drafted, such as to tie construction to the development of a specific NGET project (such as G2W) when another project may ultimately deliver the connection infrastructure. ***Post-hearing Note**: In support of its conclusion that a requirement should be included within the DCO to restrict commencement until the Applicant has greater certainty over its grid connection is unnecessary, the Applicant also highlights the Secretary of State's decision letter dated 29 August 2025 in respect of the Morgan Offshore Wind Project which notes at paragraph 4.18 that: "The ExA considered that the threat of stranded assets was unrealistic, noting the Proposed Development would not be commercially feasible without certainty regarding its onshore connection to the grid, and construction would therefore not take place until this… The ExA concluded no Requirement or condition was necessary within the DCO to secure the transmission infrastructure in advance."* ***Post-hearing Note:** matters raised by NGET, Sir John Hayes and LCC in respect of the Scheme interrelationships with other projects are addressed in full in response to Agenda Item 6 at page 44 of this note.* Ms Power also respectfully disagreed with suggestions that the Applicant had not engaged meaningfully with stakeholders and incorporated their inputs into the design of the Scheme. She referred to the **Design**

		Approach Document [APP-268] which evidences the various design changes made to address stakeholder comments, and highlighted more broadly the extensive consultation and engagement the Applicant has undertaken with local communities and stakeholders, as evidenced throughout the Application, including most extensively in the **Consultation Report [APP-037]**. Site Selection – BMV Land The ExA asked the Applicant to explain the reasons for selecting the proposed Site and its consideration of alternatives, with particular reference to paragraph 4.3.15 of NPS EN-1. Michelle Burns, Associate at Quod, appearing on behalf of the Applicant, explained that site selection matters are principally addressed within the **Planning Statement – Appendix D: Site Selection Report [APP-264]**. Ms Burns explained that the report sets out the site selection principles applied by the Applicant at both a regional and local level. She noted that, at the regional level, the assessment considered factors including irradiance, topography, network connection opportunities, landholdings, agricultural land classification and land type, flood risk, and planning and environmental designations. She explained the **Planning Statement – Appendix D: Site Selection Report [APP-264],** which summarises the relevant policy requirements from NPS EN-1, EN-3 and EN-5 that informed site selection and the consideration of alternatives. Ms Burns also noted that the Site Selection Report is supplemented by **ES Chapter 3: Alternatives and Design Evolution [APP-254].** The ExA asked the Applicant to explain how agricultural land quality had been taken into account during site selection, given the extent of Best and Most Versatile (BMV) land within the Order Limits, with reference to relevant provisions of NPS EN-1. Ms Burns, for the Applicant, explained that the Applicant did not identify a specific site at the outset, but instead considered a broad search area within approximately 15km of the prospective grid connection point. Referring to Figure 4.3 of the **Planning Statement – Appendix D: Site Selection Report [APP-264],** she noted that BMV land is prevalent throughout the area and that there is no area of sufficient scale capable of accommodating a solar development of the proposed size without involving a significant proportion of BMV land, which makes complete avoidance of BMV land near impossible for the Scheme.

		Ms Burns explained that site selection was also influenced by Natural England's provisional ALC mapping, and that when the Site was identified, following discussions with landowners, detailed surveys were undertaken by the Scheme's agricultural land and soils expert. ***Post hearing Submission:*** *A post hearing note Post ISH1 Note: Strategic Site Selection will be submitted at Deadline 2 which further sets out the consideration of best and most versatile (BMV) land take. The note will provide further clarification in respect of the Applicant's site selection criteria, to build upon the information contained within the* ***Site Selection Report*** *[APP-264]. It will also explain the principal factors that informed the identification and selection of the Site, including the Scheme's generating capacity requirements, the availability of a suitable grid connection, environmental and planning constraints (including, among other constraints BMV land and flood risk), engineering considerations, land availability and deliverability.* *The Applicant proposes to submit this Post ISH1 Note: Strategic Site Selection at Deadline 2 on the basis that:* • *This Post ISH1 Note: Strategic Site Selection will speak to and cross refer to the Post ISH1 Note: Sequential Test and Exception Test requested by the ExA under Action 3 of the* ***Action Points from Issue Specific Hearing 1 (ISH1)*** *[EV3-008].* • *The Applicant has produced technical and modelling updates to* ***ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2)*** *and associated documents and figures at Deadline 1. Providing the second note at Deadline 2 will enable the Applicant to fully incorporate those changes, and any feedback received on them by relevant statutory consultees, into the note.* • *The Applicant has been made aware through engagement and comments at ISH1 that local authorities intend to raise new and detailed comments on site selection, BMV and flood risk within their Local Impact Reports (LIRs) submitted at Deadline 1. The Applicant considers it will be more helpful to the ExA and those local authorities if it can ensure these notes both address any new or extrapolated comments the LIRs will raise.* The ExA queried whether the Application documents provided certainty that land currently classified as Grades 1 and 2 would be restored to its original agricultural land classification following decommissioning,

		noting an inconsistency between statements regarding restoration and acknowledges that restoration to the original grade could not be guaranteed in all locations. Ms Burns confirmed that engaging with both LCC and Natural England regarding restoration of agricultural land and that the Applicant would provide updated documents in respect of this at Deadline 1 Ms Power added that, on a precautionary basis, the Applicant has assumed that it may not be possible to guarantee restoration of certain limited areas affected by permanent hardstanding to their original Grade 1 or Grade 2 classification following decommissioning. However, she emphasised that the Applicant would seek to restore agricultural land to its former classification wherever reasonably practicable and would provide further clarification on this point in its Deadline 1 response. ***Post-hearing Submission:*** *The Applicant has submitted* ***Post ISH1 Note: Best and Most Versatile (BMV) Land Take (Doc Ref. 8.29)*** *at Deadline 1 to clarify where* ***ES Chapter 5: Agriculture and Soils*** *(**Doc Ref. 6.1 Rev 1)** has identified permanent and temporary effects on agricultural land and the proposed approach to restoration, as secured through the* ***Outline Soil Management Plan (OSMP) (Doc Ref. 7.14 Rev 1)***. <u>Site Selection – Flood Risk</u> The ExA also sought further explanation of how the Sequential Test and flood risk considerations had informed site selection. Ms Vince, on behalf of the Applicant, referred to pages 19 to 21 of the **Planning Statement – Appendix D: Site Selection Report [APP-264],** which summarises the flood risk considerations taken into account during site selection. She also referred to Figure 3.7 on page 20, which shows the flood risk context of the Site and surrounding area, noting that much of the land surrounding the principal grid connection point falls within Flood Zones 3a and 3b. She explained the Applicant had applied, following the Sequential Test, the exceptions test, in relation to key components of the Scheme. In response to a request from the ExA, Ms Vince agreed that the Applicant would produce a consolidated document setting out how flood risk considerations influenced site selection and how the Sequential and Exception Tests had been applied.

		Post-hearing Submission: *The Applicant proposes to submit a consolidated document explaining the application of the Sequential Test and Exception Test at Deadline 2. It will consider the relevant provisions of national policy and guidance, including the NPPF and Planning Practice Guidance, explain how the Sequential Test has been applied in the context of the Scheme, and provide further commentary on the identification and assessment of potential alternative locations at the site selection stage having regard to the concept of "reasonably available" sites. It will also explain the application of the sequential approach within the Site itself, including the siting of more vulnerable development in areas of lower flood risk, where reasonably practicable.* *The Applicant proposes to submit this Sequential Test and Exception Test note at Deadline 2 on the basis that:* • *This Post ISH1 Note: Sequential Test and Exception Test note will speak to and cross refer to the Post ISH1 Note: Strategic Site Selection requested by the ExA under Action 3 of the* ***Action Points from Issue Specific Hearing 1 (ISH1)*** *[EV3-008].* • *The Applicant has produced technical and modelling updates to* ***ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2)*** *and associated documents and figures at Deadline 1. Providing the second note at Deadline 2 will enable the Applicant to fully incorporate those changes, and any feedback received on them by relevant statutory consultees, into the note.* • *The Applicant has been made aware through engagement and comments at ISH1 that local authorities intend to raise new and detailed comments on site selection, BMV and flood risk within their Local Impact Reports (LIRs) submitted at Deadline 1. The Applicant considers it will be more helpful to the ExA and those local authorities if it can ensure these notes both address any new or extrapolated comments the LIRs will raise.* <u>Pylon Height</u> The ExA sought clarification as to the circumstances that would require pylons of up to 66m high, as referred to in the **Design Parameters** [AS-022]. Tom Fowler, Head of Planning at LSTC, appearing on behalf of the Applicant, explained that the overhead line has been designed by reference to statutory ground clearance requirements. He noted that the final pylon heights will depend on the detailed design and the extent to which the permitted limits of deviation

		are utilised. Mr Fowler explained that, as pylon locations move within the limits of deviation, span lengths may increase, which in turn increases conductor sag and can affect ground clearances. The design must therefore retain sufficient flexibility to maintain the required statutory clearances over roads, existing electricity infrastructure and other ground features. Mr Fowler explained that the proposed pylon design includes a vertical limit of deviation of up to 7.4m, equivalent to two panel extensions on the selected pylon type. He stated that this flexibility will allow the Applicant to respond to site-specific constraints and maintain the required statutory clearances if the limits of deviation are exercised. Mr Fowler noted that the 66m maximum height within the Design Parameters is derived by applying this additional 7.4m allowance to the maximum pylon height currently assumed within the design and therefore represents the upper height limit rather than the anticipated height of the pylons as currently designed. The ExA queried whether longer span lengths would require taller pylons in order to maintain the necessary clearances. Mr Fowler, on behalf of the Applicant, confirmed that pylons are spaced further apart, conductor sag can increase and, in certain circumstances, pylon heights may need to increase to maintain the required ground clearances. However, he also explained that the final height also depends on what lies beneath the span, as different statutory clearance requirements apply to ground level, roads and existing electrical infrastructure. Mr Fowler explained that this is the purpose of the vertical limits of deviation and that they work in conjunction with the longitudinal and lateral limits of deviation shown on the **Works Plans [APP-010]**. The ExA queried whether, in light of concerns raised by the Internal Drainage Boards and local farmers regarding clearance heights, the proposed pylons would need to be taller in certain locations. Mr Fowler, on behalf of the Applicant, stated that the overhead line in the Grid Connection Route has been designed to meet statutory ground clearance requirements in accordance with relevant industry guidance and specifications. He noted that the design takes account of electrical clearances, EMF requirements and applicable safety standards. Mr Fowler explained that the relevant specification requires

		a minimum ground clearance of 8.1m, whereas the Applicant has designed the Scheme using an 8.5m clearance to provide a degree of flexibility and to accommodate constraints that may arise once more detailed survey and LiDAR information becomes available at the detailed design stage. Mr Fowler noted that this approach also takes account of 'Avoiding danger from overhead power lines'[3] published by the Health and Safety Executive and other relevant industry standards and best practice. Ms Power, on behalf of the Applicant, added that the proposed design approach is consistent with industry standards and is intended to ensure that activities like agricultural operations can continue safely beneath the overhead line infrastructure. She noted that the Applicant is discussing these matters further with the relevant parties through the Statement of Common Ground (SoCG) process. The ExA then asked whether the pylons could ultimately be shorter than the heights currently assumed within the design. Mr Fowler explained that there is no minimum pylon height prescribed by the Scheme and that pylon heights will be refined during detailed design, provided statutory clearances can still be achieved. He noted that, during the detailed design phase, if shorter pylons can be accommodated whilst maintaining the required clearances, there is no reason why these could not be implemented and confirmed that pylon heights are dictated by what lies beneath each span, whether roads, existing electricity infrastructure or other constraints. He explained that there is not a uniform clearance or height across the entire route; rather, each span is designed to achieve the relevant statutory minimum clearances having regard to the specific features located beneath it. Mr Bassford, on behalf of NGET, raised concerns regarding the heights of and separation between pylons, and how this may interfere with NGET's infrastructure.

[3] Health and Safety Executive, *Avoiding danger from overhead power lines*, (2013), GS6 (Fourth Edition). Available at: Avoiding danger from overhead power lines - HSE [Accessed on 14/09/26].

		Ms Power responded that technical coordination between the Applicant and NGET, including in respect of appropriate separation between pylons, had been the subject of design workshops undertaken in late 2025. At that time, the Applicant had understood there was sufficient room for an appropriate stand off between assets to be achieved. She stated that those discussions were subject to confidentiality agreements between the Applicant and NGET, meaning the Applicant was not in the position to respond on these matters during the hearings. However, Ms Power also explained that the Applicant continues to seek engaging with NGET on these matters, and would review and respond to any new technical information NGET can now provide. The ExA requested that the issue be progressed through discussions between the parties. The ExA requested a submission in writing by NGET to provide the details of concerns raised regarding interactions between the Scheme infrastructure and its infrastructure. The ExA also requested an update on the engagement between the parties on these matters, where possible, via the SoCG to be submitted at Deadline 1. ***Post-hearing submission:*** *The* ***Statement of Common Ground with National Grid Electricity Transmission (Doc Ref 8.18)*** *submitted at Deadline 1 sets out the areas of agreement and disagreement between the Applicant and NGET. NGET has not provided details in its latest updates to the SOCG in respect of the above interactions. The Applicant will review and respond in writing to any further details provided by NGET at Deadline 1 in respect of interactions between the Scheme infrastructure and NGET current or proposed infrastructure.* <u>Third-Party Centreline/Access</u> The ExA asked the Applicant to explain the purpose of the "third-party centreline" and "third-party access" markings shown on **ES Figure 2.7: Grid Connection Route Illustrative Construction Layout Plan [APP-079],** including their relationship to the proposed works and their potential effects on nearby properties and vegetation. Mr Fowler, on behalf of the Applicant, explained that the blue centrelines identify the existing National Grid Electricity Distribution (NGED) overhead electric line assets comprising 33kV and lower voltage lines which fall within the Order limits. Mr Fowler explained that the Applicant has designed operational

		clearances to oversail those overhead electric line assets with its Grid Connection Route overhead lines, and this would be its preferred design in the first instance. However, the Applicant has also retained flexibility within the Order Limits to accommodate the potential undergrounding of existing NGED assets, should reasons arise which mean oversailing is not possible or preferred by NGED at the point of detailed design. The "third party access" markings provide access to those existing NGED assets, should they need to be undergrounded. The Applicant and NGED are continuing to engage in respect of the preferred design by NGED. Mr Fowler acknowledged that some of the identified areas are located close to residential properties. This reflects the location of the existing NGED assets (i.e. existing overhead lines which cross through properties). He explained that the Applicant would work with NGED and affected landowners during detailed design to address any impacts on residential properties, vegetation and access arrangements. Ms Power, on behalf of the Applicant, noted that the Applicant is negotiating bespoke protective provisions with NGED. She explained that those protective provisions would govern the future approvals process for interactions with NGED's assets and that this is the standard approach adopted on DCO projects. She further explained that the protective provisions would provide NGED with approval rights to ensure that interactions with its assets are appropriate, including where any works affecting existing underground assets are proposed. Ms Power noted that negotiations on the protective provisions remain ongoing. *Post hearing note: The protective provisions for the benefit of NGED have now been agreed and are included in the **Draft DCO** submitted at Deadline 1 (Doc Ref. 3.1 Rev 2).* <u>Broadgate, Longfield Commercials</u> The ExA queried the purpose of a proposed third-party access route to enable works to NGED assets adjacent to Broadgate, Longfield Commercials (passing through the commercial yard), including who would use it, how frequently and for what purpose.

		Mr Fowler, on behalf of the Applicant, explained that, at this stage of the project and in the absence of wayleave or access information from NGED for its asset in that location, the Applicant had identified what it considered to be the most appropriate route between the nearest public highway and NGED's assets using aerial photography, Ordnance Survey mapping and field boundary information. Mr Fowler explained that the third-party access shown on the plans provides a potential means of access to NGED's assets to carry out any necessary works associated with the 400kV OHL works, (i.e., oversailing the DNO assets (preferred option) or any diversion and/or mitigation works should the assets be undergrounded), should NGED be unable to rely on its existing wayleaves. Mr Fowler noted that the route has only been included within the DCO as a contingency measure to enable access for any works that NGED may need to undertake. He explained that the frequency of use (if any) would depend on NGED's detailed design and construction methodologies and that, ideally, NGED would utilise its existing wayleaves if undergrounding were to be pursued, such that new assets rights did not need to be sought over the Longfield Commercial land. However, Mr Fowler added that, given the age of some historic wayleave agreements, it cannot be assumed that those rights would always be available, and the proposed access therefore provides a fallback position within the DCO. Jennifer Pennington, raised concerns regarding the potential effects of the proposed access arrangements and requested greater clarity regarding the implications for the affected landowner. Ms Power on behalf of the Applicant confirmed that the Applicant had engaged with the affected landowner and was addressing the concerns raised. She reiterated that the preferred approach was to oversail the NGED assets and avoid use of the proposed access route where possible. Ms Power explained that the access powers were included only as a contingency and noted that further discussions with the landowner and NGED may inform later submissions to the examination. Should the landowner outline further concerns in writing, the Applicant will consider these and respond to them in the subsequent deadline. The ExA suggested that any further concerns on behalf of the landowner should be submitted in writing at Deadline 1.

		<u>Solar Development Area – Construction Approach – concurrent / phased delivery</u> The ExA asked the Applicant to explain the rationale for constructing the four Solar Development Areas concurrently, rather than via a phased approach, and whether alternative construction phasing options had been considered to minimise disruption to local communities. Chris Coates, Origination and Engineering Lead at Downing LLP, appearing on behalf of the Applicant, explained that the indicative construction programme presented in **ES Chapter 2: The Scheme** [AS-017] assumes that Parcels A, B, C and D would be constructed concurrently. Mr Coates explained that this approach has been adopted having regard to the proposed planning and construction programme and the originally anticipated 2033 energisation of the Scheme, while Ms Tishler added that this approach had been adopted for the purposes of Environmental Impact Assessment, referring to Plate 2.13 within **ES Chapter 2: The Scheme** [AS-017] as it represents the worst-case construction scenario assessed. Ms Tishler noted that the traffic figures assessed assume construction activity occurring concurrently across all four Solar Development Areas and therefore represent the maximum level of construction traffic considered within the EIA assessment envelope. Ms Power, on behalf of the Applicant, also explained that, whilst some elements of the Scheme may potentially be capable of being phased, other elements, such as the substations and BESS infrastructure, may still need to be constructed concurrently. Ms Power noted that the Environmental Statement assesses the fastest construction programme and worst-case scenario, and that these constraints have not been expressly set out within the Application documents. She indicated that the Applicant could provide further explanation of where phasing may be feasible and where concurrent construction may still be required. The Applicant agreed to respond in writing to the ExA's query as to whether a phased construction approach, rather than a concurrent construction approach, was feasible and would reduce disruption to local communities or whether a concurrent construction approach is still required. ***Post-hearing Note**: further to the request by the ExA, the Applicant has prepared the below further information on the potential to phase construction of the Solar Development Area.*

		The Applicant considers that it may be possible to phase / stagger at least some of the construction programmes for the parcels of the Solar Development Area. However, this is dependent on the final construction methodology, procurement strategy, and the availability of contractors appointed on the Scheme. *Examples of methodology or contractor availability factors which would influence the final construction programme, include:* • *Work packages for contractors are likely to be set up by the type of work. For example, enabling and civils works contractor would undertake the works associated with the establishment of the Site, electrical infrastructure would be installed by specialist contractors, planting would be undertaken by a landscape contractor etc. Depending on the work package either one or multiple contractors may be used to carry out the works.* • *Work packages would be sequenced in a chronological order to enable the build out of the Parcels, with just-in time delivery of materials scheduled accordingly.* • *Some works (e.g. site clearance and the construction of watercourse crossings) would be seasonally constrained and, therefore, would need to be completed during certain time periods only.* *The Applicant has also had regard to the relative benefits of a phased approach vs a concurrent approach to the build out of the Solar Development Area.* • *A phased approach may reduce the peak construction traffic flows associated with the Scheme on road links that would be used by the construction traffic servicing all or multiple land parcels of the Solar Development Area (i.e. the A16 and Hull's Drove). However, the ES did not identify residual significant effects on these road links from construction traffic in the Scheme only scenario, so this would not change the significance conclusions set out in* ***ES Chapter 15: Traffic and Access*** *[APP-066].* • *A significant noise effect from construction traffic was identified for residential properties along Langary Gate Road within* ***ES Chapter 13: Noise and Vibration*** *[APP-064]. However, further phasing of Solar Development Area parcels would not reduce peak traffic flows on this road, as it is only construction traffic associated with the build out of Parcel D that would use this road. A potentially significant cumulative construction traffic effect was identified on A16 South of Crowland, A16 North of Peterborough, and Hull's Drove (East) within* ***ES Chapter 15: Traffic and Access*** *[APP-066], which would service all or multiple Solar Development Area parcels, however, the significant effect was largely attributed to the traffic flows associated with cumulative schemes. A potentially significant cumulative*

		traffic effect was also identified at A151 Holbeach Road, however, this road would be predominantly used by the Grid Connection Route traffic for the Scheme rather than traffic servicing the Solar Development Area. The potentially significant cumulative effects would only occur, if the peak construction traffic associated with the Scheme occurs at the same time as the peak construction traffic of cumulative schemes. Section 7.6 of the ***Outline Construction Traffic Management Plan (OCTMP)*** *[APP-278] includes a commitment to explore further opportunities to reduce cumulative impacts during the construction phase, once further details are known, such as project timeframes and construction approach.* *In conclusion, the Applicant considers that only residual significant effects associated with construction traffic, as set out within* ***ES Chapter 13: Noise and Vibration*** *[APP-064] and* ***ES Chapter 15: Traffic and Access*** *[APP-066], could have the potential to be altered by further phasing of the Solar Development Area parcels. However, for reasons set out above, the Applicant does not consider that further phasing of the Solar Development Area would materially reduce the residual significant effects identified within the ES. When combined with the factors noted above which may influence the feasibility of phasing, and which will not be fully confirmed until the procurement of materials and contractors for the Scheme, it is not considered that securing a specific phasing strategy within the DCO is appropriate. Nevertheless, in accordance with paragraph 2.3.2 of the* ***Outline Construction Environmental Management Plan (Doc Ref. 7.10 Rev 2)****, details of construction phasing are to be agreed with the local planning authority as part of the detailed CEMP post-DCO consent.*
7	**Flood risk, water quality and resources**	Flood Risk – EA Summary In response to a question from the ExA asking the EA to summarise its key flood risk concerns, Sacha Lavers (Flood Risk Advisor) and Phillip Sale (Modelling and Forecasting Business Partner) for the EA, appeared on behalf of the EA and provided an update on discussions with the Applicant since submission of its **Relevant Representation** [RR-047]. The EA confirmed that the Applicant had met with the EA and that it was broadly satisfied with the Applicant's approach to defended flood risk, fluvial flood risk and residual flood risk. and confirmed that any unresolved matters would be addressed in the **Statement of Common Ground with Environment Agency (Doc Ref 8.12)**. The ExA asked for the Applicant's input and their plan for next steps. The ExA also requested a definitive list of the relevant flood risk documents for the ExA's consideration.

		Ms Power, on behalf of the Applicant, confirmed that further information would be provided in writing at Deadline 1, noting that a suite of updated documents reflecting engagement with the EA since submission of its **Relevant Representation** [RR-047] would be submitted. She also confirmed that the Deadline 1 covering letter would clearly identify the documents and direct the ExA to the latest versions of the Flood Risk Assessment, modelling and supporting flood risk information. Astrid Tishler, Associate Director at AECOM, appearing on behalf of the Applicant, also confirmed that the Applicant will continue to work through comments received from the EA as discussions on the SoCG progress. ***Post-hearing Submission:*** *Following discussions with the EA and the receipt of EA's Relevant Representation [RR-047], the* ***ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2)*** *has been updated at Deadline 1 to provide further explanation on the application of the Exception Test, overland flow paths in Gotts catchment, provision of an access strip to the Crowland and Cowbit Washes Flood Storage Reservoir in Land Parcel A, and further discussion on the EA flood defence assets and tidal flood risk.* *The following annexes to the* ***ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2)*** *have also been updated at Deadline 1 for the following reasons:* - ***ES Appendix 11-3: Flood Risk Assessment - Annex B (Doc Ref 6.3 Rev 1)****: to include Appendix 1 of the South Holland Main Drain Hydraulic Modelling Report which was missed from the submission by error;* - ***ES Appendix 11-3: Flood Risk Assessment – Annex D (Doc Ref 6.3 Rev 2)****: in response to comments received in EA's* ***Relevant Representation*** *[RR-047] to include a new Figure 1-6 to illustrate relevant tidal and fluvial flood defences associated with the River Welland; and* - ***ES Appendix 11-3: Flood Risk Assessment - Annex E (Doc Ref 6.3)****: a new annex produced in response to comments received in EA's* ***Relevant Representation*** *[RR-047] to provide a sensitivity test for the H++ scenario.*

		A full account of all updates made to ***ES Appendix 11-3: Flood Risk Assessment*** *(Doc Ref. 6.3 Rev 2) and associated annexes in response to EA's* ***Relevant Representation*** **[RR-047]** *is provided within the* ***Relevant Representations Report*** *(Doc Ref. 8.5).* <u>Assessment of Flood Zone 2</u> The ExA asked where the Application documents demonstrate that Flood Zone 2 areas had been avoided. Chris Brandon, Associate Director at AECOM, appearing on behalf of the Applicant, explained that following consultation with the EA on the flood modelling scenarios required for the Site, the flood modelling undertaken for the Site includes the 1 in 1,000-year event with climate change. The extent of this model run covers both Flood Zone 2 and Flood Zone 3 extents. Normally Flood Zone 3a flood modelling would typically only assess the 1 in 100-year event with climate change; however, in this region of South East Lincolnshire, the requirement is to model the 1 in 1,000 year plus climate change scenario, which encompasses Flood Zone 2 in that extent. The ExA asked the Applicant to identify where within the Application documents the Scheme layout is overlaid with the relevant flood zones and flood modelling outputs. Mr Brandon referred to the **Outline Drainage Strategy, Annex D [APP-231]**, explaining that the drainage plans and associated flood modelling extents illustrate the layout of the Scheme in relation to the modelled flood extents, including the 1 in 1,000-year event plus climate change scenario, and show how higher-risk flood areas have been avoided, where possible. He confirmed that should any updated modelling be undertaken at the request of the EA, which results in wider updates being required to the wider application documents, this would be undertaken upon agreement with the EA. ***Post-hearing note:*** *Flood Zone 2 is defined by the EA as land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding. Flood Zone 3a is defined by the EA as land having a 1 in 100 or greater chance of flooding each year from rivers, when the presence of any flood defences are ignored. Flood Zone 3b covers land*

		that has a 1 in 30 year or greater annual probability of flooding, with any existing flood risk management infrastructure working effectively. *To clarify the position on Flood Zones 2 and 3 within the Solar Development Area, the Applicant notes that the mapping included within* ***ES Appendix 11-4: Outline Drainage Strategy, Annex D*** *[APP-231] includes flood extents for:* • *1 in 30 year scenario (Flood Zone 3b);* • *1 in 100 year scenario with climate change (Flood Zone 3a); and* • *1 in 1,000 year scenario with climate change (Flood Zones 2 and 3 combined).* *The latter scenario, showing the extent of 1 in 1,000 year flood extent with climate change, encompasses the extents of both Flood Zones 2 and 3 and has been used to inform the development of the Scheme layout and flood risk mitigation requirements, as set out within Table 5-8 of* ***ES Appendix 11-3: Flood Risk Assessment (Doc Ref. 6.3 Rev 2)****. Further explanation of the application of sequential and exception tests for the siting of infrastructure outside of areas at risk of flooding and for the development of the Scheme layout will be provided at Deadline 2.* <u>Siting of Infrastructure</u> The ExA asked about the location of welfare facilities and the associated flood risk during both the construction and operational phases of the Scheme. Mr Brandon explained that the Solar Development Area's proposed construction compounds within Flood Zone 3 are located to the north of the South Holland Main Drain for logistical reasons associated with construction of that part of the Scheme to reduce movements across the South Holland Main Drain. He noted that the Applicant had undertaken an assessment of the flood risk to welfare facilities and confirmed that safe refuge arrangements would be provided to ensure occupants could reach safety in the event of flooding. The ExA asked how decisions had been made regarding the location of Scheme components within Flood Zones 3a and 3b and the rationale for locating particular elements of the Scheme in specific locations.

		Mr Brandon, on behalf of the Applicant, explained that the FRA addresses the sequential siting of development within the Order Limits. He noted that the initial detailed flood modelling informed the location of key infrastructure, including substations and the BESS, outside undefended flood risk areas where possible. Mr Brandon explained that one substation had been moved from Parcel B to Parcel C to avoid an area of Flood Zone 3 associated with the River Welland breach scenario. He further stated that it had not been possible to locate all infrastructure outside Flood Zone 3b due to site constraints and the absence of suitable alternative locations within the Order Limits that would not require substantial engineering and flood risk management interventions. Mr Semakula, on behalf of Lincolnshire County Council, stated that, whilst the strategic site selection process and application of the sequential test had been undertaken in a substantial manner, further clarification was required in relation to the areas of Flood Zone 1 land that were discounted, the location of certain solar stations within Flood Zone 3b, and the extent to which restoration assumptions had informed the sequential test conclusions. Ms Power, on behalf of the Applicant, confirmed that the Applicant could provide a further summary which would bring together the relevant figures from Annex D of the Outline Drainage Strategy and the Flood Risk Assessment, setting out in a clear and staggered manner how flood risk considerations informed the location of the various Scheme components. ***Post-hearing Submission:*** *The Applicant will submit a Post ISH1 Note on the application of the Sequential and Exception Tests for the development of the Scheme layout at Deadline 2. This is to enable the EA's comments on the hydraulic modelling for the Site to be agreed with the EA first, and therefore enable the Applicant to present one cohesive set of figures which uses the most up to date modelled extents.* <u>Flood Risk – Emergency Planning</u> The ExA asked how paragraphs 5.8.34 and 5.8.36 of NPS EN-1 relating to emergency planning, safe access and evacuation had been addressed in relation to welfare facilities located in areas of flood risk.

		Mr Brandon, on behalf of the Applicant, referred to paragraph 5.3.136 of the **Flood Risk Assessment** [AS-020]. He explained that flood risk had been assessed for construction compounds across the Scheme, including maximum model flood depth and breach scenarios associated with the River Welland and areas within Flood Zones 3a and 3b. Mr Brandon stated that welfare cabins would be elevated above the maximum modelled flood depths to provide safe refuge for occupants, including during the 1 in 1,000 year plus climate change event. Ms Vince, on behalf of the Applicant, said at page 45 of **Planning Statement - Appendix B National Policy Statement Accordance Tables** [APP-262], the Applicant has stated that the **OCEMP** (**Doc Ref 7.10 Rev 2**) does ensure there will be preparation of an emergency response plan and the consultation with local emergency services. The ExA asked whether the relevant emergency services and authorities had been consulted on the proposed emergency planning and flood refuge arrangements for welfare facilities. Mr Brandon, on behalf of the Applicant, confirmed that the relevant emergency services had not been consulted at this stage but that as detailed in the **OCEMP** (**Doc Ref 7.10 Rev 2**) they would be consulted on the drafting of the plan when the Applicant brought it forwards. Ms Tishler, on behalf of the Applicant, added that the locations of the construction compounds within the Solar Development Area are not fixed, and as such, the **OCEMP** (**Doc Ref 7.10 Rev 2**) establishes principles for the provision of safe refuge and flood risk mitigation, on the basis of where the siting of construction compounds within Flood Zones is considered unavoidable. The ExA suggested that further information, in the form of an emergency plan (in consultation with the relevant emergency services), should be provided. The ExA acknowledged following a discussion with Ms Power, on behalf of the Applicant, that a fully developed and consulted-upon emergency plan would be challenging to deliver by Deadline 1. It was agreed that the Applicant would provide by Deadline 2, an outline flood risk emergency plan setting out key principles to be agreed with the relevant authority, including arrangements for compounds located within flood zones and safe evacuation procedures including engagement with the relevant emergency services regarding the proposed approach. Ms Power for the Applicant stated that the Applicant's

		intention within this emergency plan was to demonstrate that at least one viable approach exists to ensure safe access, refuge and evacuation in accordance with flood risk requirements. ***Post-hearing Submission:*** *The Applicant will provide an Outline Flood Emergency Plan for Deadline 2, illustrating safe access and escape routes (for both construction and operation), developed in consultation with the relevant consultees and with reference to NPS EN-1 paragraphs.* <u>Water Framework Directive (WFD) Assessment</u> The ExA asked the EA about any comments they had on the Applicant's WFD Assessment. Mr Jeremy Pile, on behalf of the EA, commented on the geomorphological assessment of the Grid Connection Route and the proposed use of temporary watercourse and access crossings, noting that some would remain in place longer than is typically envisaged for temporary works. In response to questions from the ExA, Mr Pile confirmed that the Applicant had agreed to review these matters and provide updated information at Deadline 1. He stated that he was confident the issues could be resolved, but noted ongoing concerns regarding biodiversity and fish impacts, particularly where open-cut cable crossings of wet ditches and drains may require temporary dewatering, over-pumping or channel disturbance. During the hearing Mr West, on behalf of the EA, noted outstanding comments on the Applicant's assessment of fish and aquatic habitats, the mitigation proposed for watercourse crossings, and the Applicant's conclusion that certain waterbodies do not support suitable fish habitat. <u>Fish and Aquatic Habitats</u> Ms Tishler, on behalf of the Applicant, confirmed that although the Applicant had been in regular engagement with the EA and attended meetings in order to discuss the approach to addressing the concerns of the EA raised in its **Relevant Representation [RR-047]**, Mr West had not been available at those meetings to discuss the assessment of impacts on fish. ***Post-hearing note:*** *The Applicant has contacted Mr West regarding his availability to discuss the assessment of fish and aquatic habitats, the mitigation proposed for watercourse crossings, and the Applicant's conclusion that*

		certain waterbodies do not support suitable fish habitat. This meeting has been scheduled for 24 September, which was Mr West's first availability. As this is post-Deadline 1, the Applicant intends to provide an update on any progress made regarding the fish and aquatic habitats assessment in the SOCG with the EA at Deadline 2. Ms Lock, on behalf of the EA, noted that the EA was seeking additional information in relation to the outline management plans but considered that these matters were being progressed through ongoing discussions with the Applicant. David Coote, Senior Managing Consultant at Ramboll, appearing on behalf of the Applicant, explained that the Applicant will be updating **ES Chapter 9: Ecology and Biodiversity** [APP-060] and **ES Appendix 11-2: WFD Report** [APP-221] to be submitted at Deadline 1 to include an assessment of impacts on fish, where watercourse crossings are proposed on permanently wet watercourses. Mr Coote, on behalf of the Applicant, explained that **ES Appendix 2-1: Watercourse Crossing Schedule** [APP-169] will also be updated for Deadline 1 to identify which watercourses with proposed crossings are assumed to be permanently wet or seasonally wet, based on survey information and aerial imagery, in order to provide an indication of their potential to support fish habitat. Mr Coote explained that the majority of drains and ditches where crossings are proposed contained low or no water during surveys and are therefore assessed as being only seasonally wet and of limited value to fish. Mr Coote noted that, where permanent water is present, pollution prevention measures and timing restrictions to avoid fish spawning periods would be considered at the detailed design stage, as set out within the **OCEMP** (**Doc Ref 7.10 Rev 2**). Mr Coote further explained that where culverts are proposed as part of watercourse crossings, these would not prevent the continued movement of fish following completion of the works, with the detailed arrangements to be secured through the **OCEMP** (**Doc Ref 7.10 Rev 2**). Mr Coote added that the Applicant, following its meeting with the EA earlier in the week, is currently considering whether any further updates to the Application documents are required to address the comments raised by the EA.

		Mr Coote also explained that the assessment presented within **ES Chapter 9: Ecology and Biodiversity** [APP-060] will be updated at Deadline 1 to include an assessment of impacts on fish and that the Applicant considers this sufficient to inform the identification of mitigation measures and likely significant effects. Mr Coote stated that, with mitigation in place as set out in the **OCEMP** (**Doc Ref 7.10 Rev 2**), no residual significant effects on fish are considered likely. Mr Coote highlighted, by way of example, that Table 3-5 of the **OCEMP** (**Doc Ref 7.10 Rev 2**) includes commitments to avoid key fish migration periods during the construction of watercourse crossings, limit works to daylight hours where reasonably practicable, and undertake fish rescue and translocation where required. In response to a question from the ExA as to whether further fish surveys were proposed before the end of the examination Mr Coote, on behalf of the Applicant, responded that this was not considered proportionate at this stage, but that this was proposed to be considered pre-construction, as set out within the **OCEMP** (**Doc Ref 7.10 Rev 2**). The ExA also queried the position regarding aquatic invertebrates. Ms Tishler confirmed that the Applicant would seek to engage further on these matters and that fish and aquatic ecology matters would be addressed through the SoCG between the Applicant and the EA. ***Post-hearing submissions:*** *The Applicant can confirm the updates discussed at the hearing to the following documents have been made and are included within the versions of these documents as submitted at Deadline 1.* • ***ES Chapter 9: Ecology and Biodiversity (Doc Ref 6.1 Rev 1)*** • ***ES Appendix 11-2: Water Framework Directive Report (Doc Ref 6.3 Rev 1)*** • ***ES Appendix 2-1: Watercourse Crossing Schedule (Doc Ref 6.3 Rev 1)*** *The Applicant has also submitted a* ***Statement of Common Ground with Environment Agency (Doc Ref. 8.12)*** *at Deadline 1, however, it will update the SoCG for Deadline 2, following the technical meeting on the assessment of impacts on fish and aquatic ecology scheduled for 24 September 2026.* <u>Water Resources</u>

		Andrea Dollard, on behalf of Anglian Water, and Mr Corcoran, on behalf of the EA, noted uncertainty as to whether water would be tankered to the Site or supplied via a mains connection and whether this arrangement was appropriate given the current level of information on the Scheme's water resource requirements. Mr Corcoran, on behalf of the EA, also requested further information regarding the Scheme's water demand and supply arrangements. The ExA also queried whether it had been clearly demonstrated that the Scheme's non-domestic water demand would remain below Anglian Water's 20m³ per day threshold. Further, the ExA asked whether adequate provision had been made for emergency water supplies and queried whether the volumes of water proposed to be tankered to the Site would be realistic given existing pressures on water resources. Ms Tishler, on behalf of the Applicant, referred to the Applicant's assessment of water supply and water resources, as set out in paragraphs 11.4.31 to 11.4.37 of **ES Chapter 11: Hydrology and Flood Risk [APP-062]**. Ms Tishler explained that the Scheme does not propose a connection to the mains water supply during construction, decommissioning, or operation for the purposes of firewater storage or panel cleaning. The only proposed connection to Anglian Water's mains network is for the operational water supply of the on-site substations, accommodating up to 10 staff. Ms Tishler noted that this would equate to a mains water demand of approximately 0.9m³ per day, which is below the threshold requiring submission of an Anglian Water Resource Assessment Form. Ms Tishler further explained that for all other uses the Applicant would only be able to use commercial third-party suppliers that have existing consents and licenses in place to provide the water supply, which would be in place regardless of the DCO Application for the Scheme. Ms Tishler also noted that an allowance for water tanker movements has been included within the traffic assessment presented in the Environmental Statement. She explained that a similar approach to water supply has been adopted for other consented solar DCO projects within Lincolnshire, including the Tillbridge Solar Project DCO. Ms Tishler added that the Applicant would continue discussions with Anglian Water through the SoCG process.

		The ExA asked whether the Applicant intended to provide the additional information requested by Anglian Water, suggesting it would be beneficial to present a water balance demonstrating how water resources would be conserved, particularly given the water-stressed nature of the area. Ms Tishler and Ms Power, on behalf of the Applicant, confirmed that the Applicant would consider the comments of both Anglian Water and the EA and respond in writing. ***Post-hearing Submissions:*** *A Water Supply Strategy will be submitted at Deadline 2 to present a water balance, comprising a summary of water supply requirements for the Scheme, potential sources for the water and to consider opportunities for water re-use within the Scheme, in consultation with Anglian Water and the EA.* *The Applicant has submitted a* ***Statement of Common Ground with Environment Agency (Doc Ref. 8.12)*** *and a* ***Statement of Common Ground with Anglian Water (Doc Ref 8.22)*** *at Deadline 1 showing the areas under discussion between the parties.* Fire Suppression The ExA queried the proposed use of water and foam for fire suppression. Ms Power, on behalf of the Applicant, explained that the type of fire suppression proposed depends on the infrastructure in question. She referred the ExA and Anglian Water to the **Outline Battery Safety Management Plan [APP-284],** noting that water would be used for the BESS and that the required volumes had been calculated in accordance with national fire service guidance. Ms Power noted that the position differs for substation infrastructure, where foam-based systems may be used. In response to further questions from the ExA, Ms Power confirmed that the Applicant would provide clarification regarding the proposed use of water or foam for the different types of infrastructure at Deadline 1.

		Post-hearing Submission: *The Applicant wishes to clarify that the emergency response and suppression systems for firefighting would be subject to detailed design. However, the overall strategy and principles for managing fire risk at the BESS Compounds is set out within the* ***Outline Battery Safety Management Plan*** *[APP-284]. Further information on the management of fire at the on-site substation compounds is provided within Table 3-4 of the Applicant's* ***Relevant Representations Report*** *(Doc Ref 8.5) in response to the relevant representation submitted by the EA (comment EA41) and within the updated* ***Outline Operational Environmental Management Plan (OOEMP)*** *(Doc Ref. 7.11 Rev 1) submitted at Deadline 1. Based on a site-specific assessment at detailed design stage, foam or other fixed suppression systems may be used, if appropriate, however, water-spray systems are more commonly and most likely to be used.*
5	**Assessment of alternatives**	The ExA asked the Applicant to explain the factors that informed the selection of the proposed solar panel technology and design. Ms Tishler, on behalf of the Applicant, referred to paragraphs 3.5.2 to 3.5.5 of **ES Chapter 3: Alternatives and Design Evolution [APP-254]**, which set out the reasons for selecting the proposed solar panel design and provide an environmental comparison of the alternatives considered. Ms Tishler explained that the Applicant considered fixed south-facing panels, east-west single-axis tracker panels and fixed east-west panels. She stated that fixed south-facing panels were selected because, within the context of the Site, they provide the most appropriate balance between energy efficiency, land use and environmental effects. Ms Tishler explained that fixed south-facing panels maximise exposure to direct sunlight throughout the day, deliver a reliable and high energy yield without the additional cost and maintenance requirements associated with tracker systems, and allow sufficient spacing between rows to facilitate biodiversity enhancements, which would be more constrained with fixed east-west panel arrangements. Ms Tishler, on behalf of the Applicant, noted that LCC, in its **Relevant Representation** ***[RR-111]***, had queried whether vertical bifacial panels, including agrivoltaic systems, had been considered as part of the design process.

		Ms Tishler explained that the Applicant's response to the Relevant Representation, to be submitted at Deadline 1 in the Applicant's ***Relevant Representations Report*** *(Doc Ref 8.5)*, will clarify why vertical bifacial panels are not considered suitable for the Scheme. She stated that such panels would require a greater land take to achieve the same energy yield and could therefore increase environmental effects, development costs and interference with private land rights. ***Post-hearing Submission:*** *the Applicant's response to LCC's* ***Relevant Representation*** *[RR-111] in respect of whether the Applicant had considered as part of the design process vertical bifacial panels, including agrivoltaic systems, is set out in the Applicant's* ***Relevant Representations Report*** *(Doc Ref 8.5) submitted at Deadline 1.* <u>Pylon Siting</u> The ExA asked for an explanation in respect of how pylons have been sited and how proposed pylon locations had been altered in response to comments raised by landowners and key stakeholders, with reference to fields and in relation to field boundaries. Mr Fowler, on behalf of the Applicant, explained that he could not identify the specific pylons that had been relocated subsequent to feedback received during consultation without referring back to the relevant Application documents. However, he explained that the Applicant's design approach seeks, where possible; depending on span lengths, ground clearance and pylons heights, to position pylons close to field boundaries in order to minimise sterilisation of agricultural land and enable farm machinery to continue operating efficiently, or maintain a stand-off distance of approximately 30m or more between field boundaries and pylon legs, where practicable, Mr Fowler explained that pylon siting is informed by a range of factors, including agricultural operations, proximity to drains, roads, existing underground utilities, protected species and ground clearance requirements. He noted that achieving all design objectives is not always possible, but that the Applicant seeks to accommodate landowner concerns where practicable. Mr Fowler confirmed that consultation feedback was considered throughout the design process and that some pylon locations were amended in response to landowner representations, subject to wider engineering and environmental constraints such as span lengths, pylon heights and conductor clearances.

		The ExA asked whether a document could be provided identifying the pylon locations that had changed during the design process. Ms Power, on behalf of the Applicant, confirmed that the Applicant would identify the relevant Application documents showing which pylon locations had been amended in response to consultation and would either direct the ExA to those documents or provide a written response, if necessary. ***Post-hearing Submission:*** *Appendix A: Pylon Locations to this note has been provided to show the movement of pylons in response to landowner feedback received during statutory consultation. Paragraphs 6.5.13 and 6.5.14 of the* ***Design Approach Document*** *(Doc Ref. 7.3) explain why these changes were made, including the relocation of pylons closer to field boundaries to reduce effects on agricultural operations (as shown on Figure 1 of Appendix A), and the realignment of pylons 4SV11 to 4SV13 to reduce potential impacts on a residential property on Delgate Bank (as shown on Figure 2 of Appendix A).* <u>Construction Compounds</u> The ExA asked about the two construction compounds south of the BESS. Ms Tishler, on behalf of the Applicant, referred the ExA to **ES Figure 2.6 [APP-078]** and **ES Figure 2.7 [APP-079].** She explained that the figures had been prepared for different purposes, with one illustrating the construction requirements for the Solar Development Area (and in this context, showing the compound required for the construction of the 400kV substation and BESS) and the other illustrating the construction requirements for the Grid Connection Route (and in this context, showing the compound required for the southern most section of the grid connection overhead lines. The ExA queried why the Order Limits extend to the edge of the fields where access tracks and construction compounds are only shown over the western portion of those fields. The ExA queried whether compulsory acquisition powers could be justified if there is not a use proposed for those fields. Ms Tishler, on behalf of the Applicant, explained that the fields have been included to provide flexibility for construction activities and cabling works. Ms Power, on behalf of the Applicant, added that the extent of the Order Limits also reflects engagement with landowners, who expressed a preference not to be left

		with severed parts of fields. She explained that the Applicant had therefore sought, where appropriate, to include entire fields rather than only parts of fields. Ms Power, on behalf of the Applicant, agreed that the Applicant would respond in writing to explain the proposed use of these fields, including how the siting of components has considered impacts on environmental features and surrounding receptors. Should there be subsequent queries as to the justification of the compulsory acquisition case for those fields, the Applicant would be available to address these within the subsequent Compulsory Acquisition hearing. ***Post-hearing Submission:*** *Appendix B: Location of Indicative Construction Compounds Within Parcel B5 to this note has been provided with a figure showing the locations of both compounds, along with a technical note which draws on the technical considerations for their indicative siting in the western part of parcel B5.* <u>Undergrounding of NGED 132kV line</u> The ExA then queried why the existing NGED 132kV line within the Grid Connection Route had not been undergrounded rather than oversailed by the proposed Scheme OHL infrastructure. Mr Fowler, on behalf of the Applicant, explained that the existing NGED asset is operational infrastructure and that undergrounding it would require extensive engagement with NGED, modifications to existing pylons, transition structures, potential network outages, temporary diversions and significantly greater cost. Mr Fowler explained that, having regard to programme, land use and construction impacts, the Applicant considered that undergrounding its own asset represented the more effective solution and therefore did not pursue the undergrounding of the existing NGED asset. The ExA asked why, in the northern section of the Grid Connection Route where other existing NGET pylons are present, the Applicant had not similarly favoured an underground solution rather than the proposed overhead line arrangement. Ms Power, on behalf of the Applicant, explained that the existing NGET pylons in the northern section are currently expected to be decommissioned or relocated by NGET's proposed G2W project. She noted that,

		depending on the programme of that project, by the time Meridian Solar Farm is constructed, those pylons may no longer be present. Ms Power explained that, if the existing pylons remain, it may be necessary to underground the Applicant's infrastructure or identify an alternative design solution to accommodate them, and Work No 14 within the **Works Plans** [APP-010] provides the flexibility to do so. However, if they are decommissioned, there may be an opportunity for Meridian Solar Farm and NGET to coordinate the design and construction of their respective infrastructure in that area, thereby avoiding inefficient or constrained design solutions. Mr Pennington, enquired about the risk of birds colliding with the proposed overhead line infrastructure. ***Post-hearing Note:*** *the Applicant responded in full to concerns regarding bird collision risk in response to Agenda Item 8 (page 49).* Mr Semakula, on behalf of Lincolnshire County Council, raised a number of additional concerns regarding site selection. These included the Applicant's approach to BMV agricultural land, the extent to which brownfield, contaminated or industrial land had been considered, the Applicant's use of larger land parcels which may have restricted the range of sites assessed, and whether the site selection process had been sufficiently driven by environmental constraints rather than land availability and landowner willingness. Mr Semakula noted that LCC had sought further clarification on a number of these points and would welcome additional information from the Applicant. Ms Power, on behalf of the Applicant, noted that there is some overlap between this matter and a number of the summaries and explanations that the Applicant has already undertaken to provide. She confirmed that the Applicant would address these points in writing. ***Post-hearing Submission:*** *the Applicant's has responded to LCC's concerns in respect of it comments in the* ***Relevant Representations Report*** *(Doc Ref 8.5) which is submitted at Deadline 1.*
6	**Interrelationships with other projects**	Mr Bassford, on behalf of NGET, reiterated concerns regarding the lack of certainty over the Applicant's grid connection arrangements, stating that a Gate 1 offer does not guarantee a connection point. He also

		expressed concern that the proposed alignment could conflict with NGET's emerging G2W and WMEL projects. Ms Power, on behalf of the Applicant, responded that there remains a fundamental disagreement between the Applicant and NGET regarding the approach to grid connection certainty (as outlined earlier in response to Agenda Item 4). Ms Power noted that NGET's position to pause engagement with projects with Gate 1 offers should not be conflated with the relevant policy framework which applies to the DCO application. Like other Gate 1 DCO projects, the Applicant has progressed the Scheme in accordance with the applicable policy framework, which enables applications to progress in advance of final formal grid connection agreements. Ms Burns, on behalf of the Applicant, outlined the Applicant's understanding of the interactions between the Scheme and NGETs G2W and WMEL projects. She noted these are principally set out within the **Inter-relationships with Other NSIPs Report** [APP-267] and referred specifically to Figure 2-2 of that Report which demonstrates the overlap of the Scheme Order Limits and the latest public draft Order Limits of the G2W project, released in November 2025. Ms Burns, explained that the DCO which will primarily deliver G2W is currently at a pre-application stage, and NGET has clarified it intends to submit in Summer 2027. In addition, separately to the G2W DCO, NGET has submitted planning application H22-0466-26 to South Holland District Council for the proposed Weston Marsh A Substation. Ms Burns noted that this application is being brought forward in advance of the G2W DCO, to provide for early delivery of the Substation in order to facilitate connection by the Outer Dowsing Offshore Wind project. Ms Power further noted that the application documents for H22-0455-26 note the acceptance of the Meridian Solar Farm for examination supports the need for new grid connection in this locality and substation infrastructure in the Weston Marsh area. ***Post Hearing Submission:*** *The relevant discussion referred to in the NGET Substation planning application can be found at page 30 of NGET's Weston Marsh Substation A, Planning, Design and Access Statement, which specifically states that: "The recent approval of the ODOW DCO, together with the acceptance of the Meridian Solar Farm DCO application for examination, the forthcoming Weston Marsh to East Leicestershire and Ossian*

		Wind Farm DCO proposals, confirms that the Weston Marsh area is essential in relation to grid connection and substation infrastructure."[4] Ms Burns explained that a series of coordination meetings and technical discussions took place between the Applicant and NGET during the pre-application stage to understand the interaction between the two projects and identify any amendments required to avoid conflicts. She noted that this included two design workshops held in June and November 2025, which focused on overhead line routing options and the design interface between the projects. Ms Burns stated that these discussions directly influenced the design of Meridian Solar Farm and resulted in amendments to the proposed alignment of the Grid Connection Route between Statutory Consultation in Summer 2025 and the DCO application in early 2026. She noted that, as discussed under Agenda Item 4, flexibility has been retained in the vicinity of the proposed Weston Marsh B Substation to allow for either overhead or underground connection solutions, together with alternative routing options where necessary to coordinate with NGET's emerging infrastructure. Ms Burns explained that the discussions with NGET were generally constructive and focused on identifying a coordinated solution for both projects. She noted that, in its response to the Applicant's additional targeted consultation (**Appendix L: Additional Targeted Consultation Materials and Applicant's Response** [APP-049]), NGET acknowledged that the project teams had worked collaboratively over a number of months to discuss the design of the two schemes and develop arrangements capable of accommodating the requirements of both projects. Ms Power further explained that the Applicant and NGET are currently negotiating a bespoke set of protective provisions for the benefit of NGET. Whilst these provisions principally relate to interactions with NGET's existing assets, Ms Power noted that the parties are also considering provisions that would

[4] NGET's *Weston Marsh Substation A, Planning, Design and Access Statement* (July 2026). Available at: Planning Design and Access Statement. [Accessed 14/09/26].

		establish a process for cooperation on the detailed design of their respective schemes, with a view to achieving a compatible design where possible. This has largely been modelled on similar provisions included within the Outer Dowsing Offshore Wind Farm Order 2025, which manage the future connection of the Outer Dowsing Offshore Wind Farm into the as-yet unconsented or built Weston Marsh Substation A. Mr Bassford, on behalf of NGET, reiterated concerns regarding the absence of a confirmed grid connection location and noted that discussions between the Applicant and NGET had been constructive, these have been stopped in accordance with NGET's current engagement policy. He confirmed NGET would continue to engage with the Applicant on protective provisions, however, this engagement remains without prejudice to its opposition to the Scheme. ***Post Hearing Submission:*** *The Applicant understands the concerns raised by NGET at the hearing to be:* *1. Whether it is appropriate for the Scheme to proceed to DCO submission where there remains latent uncertainty as to its final grid connection offer.* *2. That the current design of the Scheme may impact the viability of or otherwise unreasonably restrict the final design of the G2W or WMEL projects.* *In respect of point 1, the Applicant does not consider it a pre-requisite for a DCO scheme to hold a formal, Gate 2 offer prior to proceeding to application. Paragraph 4.11.6 of NPS EN-1 clearly states that: "Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible."* *The Applicant has prepared a grid connection for the Scheme based on the most up-to-date information held on its likely grid connection, including the reference within its Gate 1 offer to a future connection at Weston Marsh. It has used the siting areas and planned Substation location prepared by NGET to identify a likely connection location. While it is acknowledged that uncertainty remains, due to the as yet submitted G2W DCO application which will provide this connection location, this uncertainty is no different to that adopted by several projects*

		prior to the NESO Connections reform (including, Outer Dowsing Offshore Wind Farm Order 2025 which was consented in advance of NGET's planned Weston Marsh substation infrastructure, in the same siting region as this Scheme). The Applicant intends to resubmit for a Gate 2 offer at the earliest opportunity. The Applicant is not aware of any reason why this would not be successful, particularly where the NESO Gate 2 readiness criteria includes consideration of whether a DCO application has yet been validated for the project. As such, the Applicant is not aware of an obvious reason why a network connection would not be possible. *In respect of point 2 and the interaction between the Scheme and NGET's projects, the Applicant has not yet been provided technical details by NGET which outline the new areas of concern it holds for the design interactions of the projects, such that the Applicant can consider and address these in its design. The Applicant understands one of the action points ascribed by the ExA to NGET following ISH1 to be an explanation of NGET's concerns with the design interactions. Once produced by NGET, the Applicant will review, and address any design concerns raised. Until that technical information is provided, the Applicant maintains its understanding, based on the design workshops held with NGET in 2025, that there is a feasible route and design which could accommodate all three Schemes, such that they remain operationally feasible and appropriately manage cumulative effects. The Applicant therefore does not consider submissions made by NGET as to the potential of the Scheme to prejudice the viability of their projects have been established.* Ms Pennington, on behalf of Meridian Action Group, welcomed use of underground cabling, rather than additional pylons, to reduce the visual impact for local residents. Mr Semakula, on behalf of Lincolnshire County Council, raised concerns regarding the cumulative effects of the Scheme, including the potential for concurrent construction with other projects, cumulative landscape and visual effects, impacts on historic landscapes arising from the combined effects of the Scheme and National Grid's proposals, waste management implications, accommodation for temporary construction workers, and the exclusion of certain transport schemes from the cumulative assessment. Ms Power, on behalf of the Applicant, acknowledged concerns regarding cumulative effects in the Weston Marsh area and explained that the Applicant had engaged with National Grid to seek to coordinate the Scheme with other proposed infrastructure and minimise cumulative impacts. In response to concerns

		raised regarding heritage, waste and other cumulative effects, Ms Power stated that the Applicant would provide further comments in writing, noting that LCC would also be making further written submissions on those matters. ***Post-hearing Submission:*** *the Applicant has responded to LCC's concerns in respect of it comments in the* ***Relevant Representations Report (Doc Ref 8.5)*** *which is to be submitted at Deadline 1.*
8	**Habitats Regulations Assessment and Biodiversity**	<u>Functionally Linked Land</u> The ExA requested an update on discussions with Natural England, including the Applicant's approach to identifying Functionally Linked Land within the **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref 6.3 Rev 1). Mr Coote, on behalf of the Applicant, explained that the Applicant had undertaken a detailed review of areas where qualifying species had been recorded and identified several key areas. Mr Coote highlighted that these included areas associated with high numbers of golden plover, together with locations regularly used by waterfowl, whooper swans, ducks and other species associated with the designated sites. Mr Coote explained that the Applicant would provide further detail at Deadline 1, including information on the relevant species recorded, the frequency of use of the identified areas, and the rationale for including or excluding particular parcels of land. Mr Coote noted that the assessment considers not only the presence of qualifying species, but also whether the use of a particular area is sufficiently important to the integrity of the relevant designated site. ***Post-hearing Submission:*** *the Applicant has provided an update on its discussions with Natural England as part of the* ***Statement of Common Ground with Natural England*** *(Doc Ref. 8.13) and further information on process of identification of Functionally Linked Land in an updated* ***ES Appendix 9-14: Habitats Regulations Assessment Report*** *(Doc Ref. 6.3 Rev 1) has been submitted at Deadline 1.* <u>Ornithology</u>

		Regarding the effect on ornithology from overhead lines, Mr Coote explained that in its responses, Natural England broadly agreed with the process and findings of analysis for the HRA in relation to collision risk, raising a few key points for further clarification. Mr Coote noted that Natural England had recommended post-consent monitoring. However, he explained that, the Applicant does not rely upon monitoring as mitigation in order to avoid substantial harm. The Applicant therefore does not consider it appropriate to secure monitoring as a requirement through the DCO. Mr Coote noted that the **OOEMP** (Doc Ref. 7.11 Rev 1), acknowledges that monitoring may be undertaken where appropriate but explained that the scope and mechanisms for delivery of any such monitoring has not yet been agreed and will be discussed further with Natural England at the point of delivery. This ensures monitoring continues to be considered by the Applicant in the finalisation of its OEMP, as an additional benefit which could be provided by the project, as opposed to a necessary mitigation to meet its impact assessments. The ExA enquired about the concerns about birds colliding with the overhead lines. Mr Coote explained that the Applicant had undertaken a collision risk assessment, including collision risk modelling. He emphasised that the model was designed to identify where the highest collision risks may occur and which species are most at risk. He explained that the assessment incorporated bird movement survey data and identified two principal areas of increased collision risk, including an area associated with golden plover and the River Welland corridor, which is used by species including whooper swans, geese and common crane. Mr Coote explained that the Applicant had reviewed these areas in detail and had considered measures to ensure that the overhead line would be sufficiently visible to birds, including during periods of low visibility and at night. He noted that these considerations would inform the detailed design of the Scheme. Mr Coote also explained that the Applicant would continue to consult with Natural England regarding the specification of bird diverters. Mr Coote noted that consideration would need to be given to the practicality of installation, ongoing management requirements and the effectiveness of the proposed

		marker design. Mr Coote confirmed that these discussions would continue as the detailed design progresses. ***Post-hearing Submission:*** *The Applicant's full response to Natural England's Relevant Representation in respect of collision risk is set out in* ***the Relevant Representations Report*** *(Doc Ref 8.5) as submitted at Deadline 1.* The ExA queried the statement that undergrounding the cable could result in greater impacts on wintering and nesting birds. Mr Coote, on behalf of the Applicant, clarified that the Applicant was not suggesting that undergrounding would necessarily result in greater impacts. Rather, Mr Coote explained that the impacts of an underground cable solution had not been assessed in detail, but that such a solution could give rise to greater disturbance to wintering birds during construction than the proposed overhead line option, due to greater temporary construction land take associated with the installation of an underground cable. Mr Coote acknowledged there would not be ongoing operational impacts from an underground cable solution. Mr Coote emphasised that the statement was intended to identify a relevant consideration when comparing alternatives.
9	**Socio-Economics**	The ExA noted that discussion under this Agenda Item would be limited to community matters, and that any remaining socio-economic matters would instead be addressed through written submissions. Esther Howe, Associate Director at AECOM, appearing on behalf of the Applicant, explained that, during construction, it is estimated that the Scheme would support, on average, 207 total net jobs per year. She noted that this figure is derived by taking the number of direct, onsite jobs per annum (184) and applying assumptions relating to displacement, indirect and induced employment. Ms Howe explained that, of the 207 net jobs, 83 jobs per year would be expected to be taken up by residents within the study area (defined as a 60-minute drive time), assuming a leakage rate of 60% outside of the study area. Ms Howe stated that this results in a minor beneficial effect, which is not considered to be significant, as set out in **ES Chapter 14: Socio-economics and Land Use [**APP-065**]**.

		Ms Howe further explained that this would represent a contribution of approximately £22.3 million GVA per year to the national economy, of which £8.9 million per year would be generated within the study area. Ms Howe explained that the **Outline Skills, Supply Chain and Employment Plan [APP-283]** sets out a variety of interventions which would be pursued post-consent to proactively maximise the employment benefits of the Scheme for the local community. Ms Howe noted that potential activities include promoting local employment, apprenticeships and education opportunities so that local residents have the skills required to access employment generated by the Scheme. Ms Howe stated that Requirement 20 in of the **Draft DCO [AS-011]** sets out that no part of the Scheme may commence until a skills, supply chain and employment plan in relation to that part has been submitted to and approved by the relevant planning authority, South Holland District Council in this case. She explained that the final plan would be in accordance with the draft plan and would confirm the objectives and activities to be pursued. Ms Howe explained that during the operational phase the Scheme is estimated to generate 11 net full-time equivalent jobs. She noted that this figure is derived from the direct operational jobs associated with the Scheme, taking into account assumptions relating to multiplier effects, deadweight and the loss of existing agricultural jobs resulting from the change in land use. Ms Howe explained that these factors produce a net employment figure of 11 jobs. She further noted that the **Outline Skills, Supply Chain and Employment Plan [APP-283]** seeks to maximise the benefits of these opportunities for local people. Ms Howe also explained that employment effects would arise during decommissioning and that these are assumed to be broadly comparable to those assessed during the construction phase. Ms Howe, on behalf of the Applicant, referred to **ES Chapter 10: Human Health [APP-061]**, which assesses impacts on access to Public Rights of Way and active travel. Ms Howe explained that, during the operational phase, the Scheme is assessed as having a long-term minor beneficial effect. She noted that a permissive path would be provided connecting PRoW between Queens Bank and Shepeau Stow, following the boundary of the Cate's Cove Corner Scheduled Monument. Ms Howe explained that the permissive path would be located within a corridor approximately 20m wide and would be suitable for pedestrians,

		cyclists and horse riders. She further noted that interpretation boards relating to the historic and natural environment would also be provided. Ms Howe explained that the design and implementation of the permissive path would be secured through Requirement 16 of the **Draft DCO (Doc Ref 3.1 Rev 2)** and implemented in accordance with the **Outline LEMP (Doc Ref 7.16 Rev 1)**. She noted that a high-level plan of the proposed permissive path has been provided. <u>Permissive Path</u> The ExA asked why the permissive pathway was selected in that area. Ms Tishler, on behalf of the Applicant, explained that the location and alignment of the permissive path had been selected to connect to existing Public Rights of Way. She noted that the permissive path would link two separate parts of the Public Rights of Way network and would also provide an opportunity to enhance public understanding of local heritage assets. Ms Tishler explained that the Outline Archaeological Mitigation and Management Strategy to be submitted at Deadline 1 would include reference to the permissive path and that the corridor could accommodate interpretation boards relating to the local historic and natural environment. She noted that the permissive path had therefore been identified as an opportunity to provide information about the Scheduled Monument and other heritage assets in the area. Ms Tishler also explained that explained the permissive path was developed in response to comments received during statutory consultation and earlier stages of engagement regarding the provision of recreational opportunities for the local community. <u>BESS</u> The ExA asked how the BESS itself constitutes a community benefit. Ms Burns, on behalf of the Applicant, explained that the BESS is identified in the **Planning Statement [APP-260]** as a benefit of the Scheme, rather than specifically as a local community benefit. Ms Burns stated that the BESS would provide benefits by enabling the sharing of grid infrastructure, facilitating load shifting, smoothing electricity generation to better match demand, improving security of supply, and reducing the risk of blackouts and brownouts.

		Outline Skills, Supply Chain and Employment Plan The ExA queried what weight should be given to the **Outline Skills, Supply Chain and Employment Plan [APP-283]**, noting that this is only an outline plan meaning that the skills, supply chain and employment opportunities it contains are subject to further agreement post-consent. Ms Howe, on behalf of the Applicant, acknowledged that the measures identified are largely potential opportunities and that there is currently limited certainty as to the specific activities that will ultimately be delivered. She explained that this level of detail is typical for DCO applications at this stage and is consistent with the approach taken on a number of other solar NSIPs. Ms Howe noted that Requirement 20 of the **Draft DCO (Doc Ref 3.1 Rev 2)** would require a final Skills, Supply Chain and Employment Plan to be agreed with the relevant planning authority before construction can commence. She explained that the Applicant would engage with Lincolnshire County Council, the district council and other relevant organisations in developing the final plan and noted that useful feedback had already been received from Lincolnshire County Council. Ms Howe added that the final content of the plan would need to be carefully considered, including the extent to which commitments may depend on contractor involvement and future procurement decisions. Ms Power, on behalf of the Applicant, explained that the drafting of the requirement had been deliberately framed so that the final Skills, Supply Chain and Employment Plan must be substantially in accordance with the outline version. She noted that this would prevent the Applicant from submitting a final plan which omitted the opportunities identified in the outline plan or which differed materially from it. Ms Power emphasised that the use of the phrase "substantially in accordance with", rather than "generally in accordance with", was intended to ensure that the final plan remains substantially the same as the outline plan presented as part of the Application. Ms Power suggested that on this basis the ExA could ascribe considerable weight to the Outline Skills, Supply Chain and Employment Plan. ***Post-hearing submission:*** *the Applicant has updated the* ***Outline Skills, Supply Chain and Employment Plan (OSSCEP) (Doc Ref. 7.17 Rev 1)****, submitted at Deadline 1 following ISH1 where the Applicant considers there were further opportunities to tighten the language in the OSSCEP.*

		<u>LCC – Skills Provider Funding and 60 minute Drive Time</u> Mr Semakula, on behalf of LCC, requested consideration be given to providing funding to support delivery of the LCC's skills, supply chain and employment objectives, noting precedent in other NSIPs. Katherine Eales, Transport and Growth Manager at LCC, appearing on behalf of LCC, also raised concerns regarding the Applicant's use of a 60-minute drive-time catchment to assess local employment benefits. Ms Howe, on behalf of the Applicant, explained that the assessment is based on a GIS-derived 60-minute drive-time catchment rather than a simple distance measure and that this approach was used to estimate the number of local jobs likely to be supported by the Scheme. Ms Eales, indicated that this is an issue on which the parties may continue to disagree and would be pursued further through the Examination process. ***Post Hearing Submission: a Statement of Common Ground with Lincolnshire County Council (Doc Ref. 8.11)*** *identifying areas under discussion between the Applicant and LCC has been submitted at Deadline 1, including the use of a 60-minute drive time catchment as a study area and the topic of employment and skills.* <u>Community Benefit Fund</u> The ExA queried why the proposed Community Benefit Fund had not been secured through a planning obligation. Ms Power, on behalf of the Applicant, noted that the Applicant's approach is consistent with that adopted on a number of recent DCO schemes, whereby community benefit funds are kept separate from the DCO consent process in accordance with current practice. Ms Power stated that the Applicant could provide further detail in writing regarding the rationale for that approach and the intended operation of the fund. The ExA asked the Applicant to explain how the proposed Community Benefit Fund had been calculated, including the basis for the figure proposed and who had been consulted in developing the approach and Ms Power, on behalf of the Applicant agreed to respond in writing to (a) explain the approach to the

		Community Benefit Fund and why this was not considered a planning matter; and (b) explain how the figure for the Community Benefit Fund was calculated. ***Post Hearing Submission: Post ISH1 Note: Community Benefit Fund (Doc Ref 8.30)*** *has been provided at Deadline 1 which explains how the proposed Community Benefit Fund has been calculated, who the Applicant has consulted in developing the approach, provides an explanation as to why the Community Benefit Fund is not considered a planning matter and addresses whether the Community Benefit Fund is secured.* <u>Further LCC Submissions</u> Mr Semakula, on behalf of Lincolnshire County Council, encouraged the Applicant to continue engaging with local colleges and skills organisations, welcomed the proposed permissive paths but suggested that a permanent public right of way should be considered, and raised concerns regarding the loss of agricultural output and associated economic activity, including employment, and how these effects are reflected within the socio-economic assessment. Ms Power, on behalf of the Applicant, noted that the colleges referred to by LCC are already referenced within the **Outline Skills, Supply Chain and Employment Plan [APP-283]**, and the intention of the Applicant would be to progress that relationship post-consent. She stated that the Applicant would be receptive to further discussions with LCC regarding collaboration with those institutions. In relation to the suggestion that the permissive path should be secured as a public right of way, Ms Power explained that the Applicant had not pursued that approach in response to feedback from the relevant landowner. She noted that the landowner's intention is that the land should be capable of returning to agricultural use following decommissioning of the Scheme and that securing a permanent public right of way could restrict that future use. Ms Power explained that the DCO therefore proposes to secure the route as a permissive path for the operational lifetime of the Scheme, whilst retaining flexibility for the land to be returned to agricultural use in the future. Ms Power stated that the Applicant could provide a further written response on the value of BMV land once it had reviewed LCC's Local Impact Report which the Applicant understands will be submitted at Deadline 1.

		Ms Howe, on behalf of the Applicant, explained that the Applicant would provide a fuller response in writing at Deadline 2 regarding the economic implications of the loss of agricultural land following its review of LCC's Local Impact Report. She noted that the Environmental Statement assesses economic effects primarily through employment impacts, including direct employment, multiplier effects and existing agricultural employment. Ms Howe stated that the Applicant considers this to be a proportionate approach and noted that the landowners within the Solar Development Area have voluntarily made their land available for the Scheme as a form of diversification. She also noted that there are no tenant farmers being displaced from the land. Ms Howe explained that the Applicant has not assessed the value of agricultural output as part of the socio-economic assessment. She added that, if the scope of the assessment were broadened to include downstream economic effects associated with agricultural production, this would also it may also be appropriate to consider a wider range of economic benefits associated with the Scheme, including matters such as business rates and other indirect economic contributions. The Applicant is satisfied its methodology has been appropriate, and widening this scope is not required. Mr Rains, on behalf of Meridian Action Group, raised concerns about the potential loss of agricultural and downstream processing jobs. Ms Howe, on behalf of the Applicant, explained that the Applicant's assessment assumes there would be no direct loss of jobs as a result of the change in agricultural land use, other than the potential loss of some contractor activity. She noted that the Applicant does not consider it likely that any such contractors would be reliant upon the affected farms for a substantial proportion of their work and therefore assumed a zero direct employment loss. Ms Howe explained that the assessment instead applies multiplier effects and deadweight assumptions when calculating the net operational employment effects of the Scheme. She further noted that the Applicant has not undertaken a detailed assessment of potential downstream job losses within the agricultural supply chain, as this was not within the scope of the Environmental Impact Assessment or the Applicant's socio-economic assessment methodology.
10	**Aviation safety**	Defence Infrastructure Organisation (DIO),

		The ExA asked DIO for an update on their position with the Applicant. Ben Manners, on behalf of the DIO, confirmed there had been constructive engagement with the Applicant since submission of its Relevant Representation. He explained that the Applicant had provided the information requested, but that the information remained subject to specialist technical review. He noted that, until that assessment had been completed, the Defence Infrastructure Organisation was not in a position to confirm whether the proposals would be acceptable. Ms Burns, on behalf of the Applicant, stated the Applicant seeks to progress a SoCG setting out the matters outstanding, and thanked the DIO for their engagement. ***Post-hearing Submission:*** *a* ***Statement of Common ground with Defence Infrastructure Organisation (Doc Ref 8.19)*** *identifying areas of discussion between the Applicant and the DIO has been submitted at Deadline 1.* <u>Gliding Clubs</u> ExA requested an update in respect of the position with Fenland Aero Club and Peterborough and Spalding Gliding Club. David Vernon, on behalf of the Applicant, stated that the Applicant has engaged extensively with the operator at the Peterborough and Spalding Gliding Club (the Club) since initial engagement began on the Scheme in 2023. There is a SoCG progressing with the Club, but it is not envisaged that the Club have any further issues with the Scheme. Mr Vernon further noted that the Applicant has amended the design through the consultation and taken into account the Club's concerns, such as the removal of a significant area of panels at the end of the Western most runway, the undergrounding of the inter-array connection between parcels A and B, the location of the solar substation in parcel A, and the final location of the 400kV substation in parcel B, away from the approach flightpaths for the club. Further work has been carried out to help the club mitigate risks as far as practicable and will continue as the project develops. ***Post Hearing Submission:*** *an SoCG identifying areas of discussion between the Applicant and the Peterborough and Spalding Gliding Club has been submitted at Deadline 1.*

		Mr Vernon, on behalf of the Applicant, explained that, the Applicant has not received the same engagement from Fenland Aero Club (the FA Club). Mr Vernon noted that the FA Club was consulted during both stages of consultation and that the Applicant had visited the FA Club in 2024 and 2025, leaving contact details for follow-up discussions. However, no engagement has taken place. He stated that the Applicant does not currently anticipate any issues arising in relation to the FA Club but will continue to seek engagement as the Scheme progresses.
11	**Any other matters**	Mr Rains, on behalf of Meridian Action Group, raised concerns regarding the cumulative impacts of energy infrastructure projects in the area and the ad hoc nature of energy planning. Ms Power, for the Applicant, noted that this has been considered by the Scheme, and referred back the discussion in the hearing earlier regarding coordination with NGET for the latest position. No other business was raised by interested parties.
12	**Review of actions and closing**	The hearing ended at 16:01.

3. List of Actions for the Applicant and Other Parties following Issue Specific Hearing 1

3.1.1. On 11 September 2026, the ExA published a list of action points for parties arising from Issue Specific Hearing 1. The Applicant has reproduced these below, with a response confirming where the Applicant has responded to the action, or confirming where the Applicant will respond to the action at a future deadline.

3.1.2. The Applicant has also added action items 12- 15 below which it recorded as actions arising from the hearing. These are combined into the table below for assistance.

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
1	Item 4	Applicant	Provide clarification note confirming whether agricultural land would be restored to its original agricultural land classification grade, how this would be secured and what the implications for productivity if restoration isn't possible following decommissioning.	D1	The Applicant has submitted **Post ISH1 Note: Best and Most Versatile (BMV) Land Take (Doc Ref. 8.29)** at Deadline 1 to clarify where **ES Chapter 5: Agriculture and Soils (Doc Ref. 6.1 Rev 1)** has identified permanent and temporary effects on agricultural land and the proposed approach to restoration, as secured through the **Outline Soil Management Plan (OSMP) (Doc Ref. 7.14 Rev 1)**.
2	Item 4	Applicant	Provide clarification note confirming the use of water for extinguishment of fires on project infrastructure.	D1	The Applicant wishes to clarify that the emergency response and suppression systems for firefighting would be subject to detailed design. However, the overall strategy and principles for managing fire risk at the BESS Compounds is set out within the **Outline Battery Safety Management Plan** [APP-284]. Further information on the management of fire at the on-site substation compounds is provided within Table 3-4 of the Applicant's **Relevant Representations Report** (Doc

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
					Ref 8.5) in response to the relevant representation submitted by the EA (comment EA41) on page 313 and within the updated **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1) at pages 28 to 33 submitted at Deadline 1. Based on a site-specific assessment at detailed design stage, foam or other fixed suppression systems may be used, if appropriate, however, water-spray systems are more commonly and most likely to be used.
3	Item 4	Applicant	Provide details of the site selection process to aid examination of the proposals having regard to NPS EN-1 paragraph 4.3.15, including reference to policies protecting Best and Most Versatile land and application of the Sequential Test for flooding.	D1	A post hearing note Post ISH1 Note: Strategic Site Selection will be submitted at Deadline 2 which further sets out the consideration of best and most versatile (BMV) land take. The note will provide further clarification in respect of the Applicant's site selection criteria, to build upon the information contained within the Site Selection Report [APP-264]. It will also explain the principal factors that informed the identification and selection of the Site, including the Scheme's generating capacity requirements, the availability of a suitable grid connection, environmental and planning constraints (including, among other constraints BMV land and flood risk), engineering considerations, land availability and deliverability.

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
					The Applicant proposes to submit this Post ISH1 Note: Strategic Site Selection at Deadline 2 on the basis that: • This Post ISH1 Note: Strategic Site Selection will speak to and cross refer to the Post ISH1 Note: Sequential Test and Exception Test requested by the ExA under Action 3 of the Action Points from Issue Specific Hearing 1 (ISH1) [*EV3-008*]. • The Applicant has produced technical and modelling updates to ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2) and associated documents and figures at Deadline 1. Providing the second note at Deadline 2 will enable the Applicant to fully incorporate those changes, and any feedback received on them by relevant statutory consultees, into the note. • The Applicant has been made aware through engagement and comments at ISH1 that local authorities intend to raise new and detailed comments on site selection, BMV and flood risk within their Local Impact Reports (LIRs) submitted at Deadline 1. The Applicant considers it will be more helpful to the ExA and those local authorities if it can ensure these

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
					notes both address any new or extrapolated comments the LIRs will raise.
4	Item 4	NGET	Issues with respect to siting of pylons, length of overhead lines between pylons, and height of pylons/overhead line. Provide further details of these potential issues and where along the grid connection route they would occur.	D1	-
5	Item 5	Applicant	Provide a figure that combines sheet 3 of Figure 2-6: Solar Development Area and Inter-Array Connections Illustrative Construction Layout Plan [APP-078] and sheet 9 of Figure 2-7: Grid Connection Route Illustrative Construction Layout [APP-079] with specific regard to the locations of the construction compounds associated within these sheets.	D1	A post hearing note has been prepared, **Appendix B: Location of Indicative Construction Compounds Within Parcel B5,** which provides a figure as requested and explains the location of indicative construction compounds within Parcel B5. This note is appended at Appendix B to this Written Summary.
6	Item 7	Applicant	Confirm and signpost the latest flood risk modelling on which the assessment is based in the revised	D1	The latest flood risk modelling on which **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref 6.3 Rev 2) is based on, has been included within the Flood Risk

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
			flood risk assessment (and any future iterations).		Assessment as resubmitted at Deadline 1. This is signposted in this note in the Applicant's Post-hearing submission in respect of Item 7.
7	Item 7	Applicant	Provide an explanation in writing of how the modelled Flood Zone 3a is the 'default' Flood Zone 2 at the site.	D2	The Applicant proposes to submit a consolidated document explaining the application of the Sequential Test and Exception Test at Deadline 2. It will consider the relevant provisions of national policy and guidance, including the NPPF and Planning Practice Guidance, explain how the Sequential Test has been applied in the context of the Scheme, and provide further commentary on the identification and assessment of potential alternative locations at the site selection stage having regard to the concept of "reasonably available" sites. It will also explain the application of the sequential approach within the Site itself, including the siting of more vulnerable development in areas of lower flood risk, where reasonably practicable. The Applicant proposes to submit this Sequential Test and Exception Test note at Deadline 2 on the basis that: • This Post ISH1 Note: Sequential Test and Exception Test note will speak to and cross refer to the Post ISH1 Note: Strategic Site Selection requested by the

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
					ExA under Action 3 of the **Action Points from Issue Specific Hearing 1 (ISH1)** [EV3-008]. • The Applicant has produced technical and modelling updates to **ES Appendix 11-3: Flood Risk Assessment (Doc Ref 6.3 Rev 2)** and associated documents and figures at Deadline 1. Providing the second note at Deadline 2 will enable the Applicant to fully incorporate those changes, and any feedback received on them by relevant statutory consultees, into the note. • The Applicant has been made aware through engagement and comments at ISH1 that local authorities intend to raise new and detailed comments on site selection, BMV and flood risk within their Local Impact Reports (LIRs) submitted at Deadline 1. The Applicant considers it will be more helpful to the ExA and those local authorities if it can ensure these notes both address any new or extrapolated comments the LIRs will raise.

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
8	Item 7	Applicant	Provide detailed evidence of how the sequential approach has been applied to the layout and design of the project (construction and operation).	D2	The Applicant will submit at Deadline 2 a consolidated document explaining the application of the sequential approach at site selection and to the siting of infrastructure within the Site itself. This will include explanation of how the siting of more vulnerable development in areas of lower flood risk has been applied. This document will also consider of comments raised by the local authorities within their Local Impact Reports, as will be submitted at Deadline 1.
9	Item 7	Applicant	Provide a Draft Emergency Plan illustrating safe access and escape routes (for both construction and operation), developed in consultation with the relevant consultees and with reference to NPS EN-1 paragraphs 5.8.15, and 5.8.33 to 5.8.36.	D2	The Applicant intends to submit a draft Emergency Plan at Deadline 2 which addresses the noted matters. The Applicant will ensure this is developed in engagement with the relevant consultees.
10	Item 7	Applicant	Provide a draft water resource strategy/ plan taking into consideration the comments made by Anglian Water Services and the Environment Agency. This should	D2	The **Outline OEMP** (Doc Ref. 7.11 Rev 1) has been updated at Deadline 1 to include a requirement to consider whether rainwater harvesting could be implemented for the Scheme during detailed design. A Water Supply Strategy will be submitted at Deadline 2 to present a water balance, comprising a summary of

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
			include reference to NPS EN-1 paragraphs 5.16.9 and 5.16.17.		water supply requirements for the Scheme, potential sources for the water and to consider opportunities for water re-use within the Scheme, in consultation with Anglian Water and the EA.
11	Item 9	Applicant	Provide clarification note regarding the community fund. To include justification for why proposed fund sits outside of the examination, how the fund would be secured, which parties have been consulted with and how the proposed figure was calculated.	D1	**Post ISH1 Note: Community Benefit Fund (Doc Ref 8.30)** been provided at Deadline 1 which explains: • who the Applicant has consulted in developing the approach • how the proposed Community Benefit Fund has been calculated, • why the Community Benefit Fund is not considered a planning matter; and • why the Community Benefit Fund is not secured as part of the Examination process.
12	Item 5	Applicant	Provide a plan showing the movement of pylons and explain how those changes arose in response to landowner feedback received during statutory consultation.	D1	Appended to this note at Appendix A: Pylon Locations is an annotated plan showing the movement of pylons. This note explains how these changes arose in response to landowner feedback received during statutory consultation.
13	Item 6	Applicant	To provide further information on the phased and concurrent construction approaches, including	D1	The Applicant has outlined in a post hearing note at pages 27-29 of this Written Summary further detail of the approach taken to construction sequencing of the

No	Agenda item	Party	Action	Deadline	Applicant's response / commentary
			the constraints associated with each option.		Solar Development Area, the feasibility of a phased construction approach, rather than a concurrent construction approach and whether this approach would reduce disruption to local communities or whether a concurrent construction approach is still required.
14	Item 7	Applicant	To engage with the EA's fish specialist to discuss the Applicant's proposed approach to fish, before submission of the relevant representations.	D1	The Applicant has scheduled a meeting with the EA's fish expert for 24 September 2026 and will update on any progress made at that meeting at Deadline 2.
15	Item 9	Applicant	To review the wording of the OSSCEP, particularly in relation to the seven identified opportunities, and consider whether commitments can be expressed with greater certainty.	D1	The Applicant has updated the **Outline Skills, Supply Chain and Employment Plan** (OSSCEP) (Doc Ref 7.17 Rev 1) at Deadline 1 to provide further certainty as to commitments made under the Plan.

4. Appendix A: Pylon Locations

P29
4SV10
P30
4SV9
P31
4SV8
4SV7
P32
4SV6
P33
P34
4SV5
Drain
3.4m
Tank
Reservoir
Nursery
Tanks
Stone
Croft
Arch
B1357
3.0m
ED Box
Track
Silo
Drains
Wheat Mere Drain
BROADGATE DROVE
Weston Fen
Delgate Drain
FOOTE'S DROVE
Settlement
BROADGATE DROVE (TRACK)
N

Project Title

Meridian Solar Farm

Map Title

Figure 1: Pylon Location Changes in Response to Landowner Feedback

Scale @ A3	Version	Drawn	Reviewed
1:5,000	0	RD	JC

Legend

- Order Limits
- Proposed 400kV lattice pylon (not to scale)
- Proposed 400kV overhead line
- Statutory consultation (2025) 400kV lattice pylon (not to scale)
- Statutory consultation (2025) 400kV overhead line

Notes:

1. 4SV6 and 4SV7 were relocated as part of design optimisation for this section, following landowner feedback to relocate 4SV8 (previously P31) ~20 metres southwest and 4SV9 (previously P30) ~15 metres southwest.

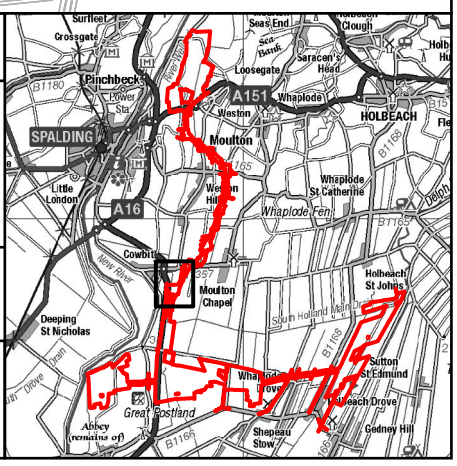
Date: 22/09/2026

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0 50 100 200 Metres

Meridian Solar



4SV14
Delgate Lodge
2.4m
Drain
Drain
P26
Drain
4SV13
DELGATE BANK
Drain
Drain
Ostler Cottage
Delgate Drain
2.8m
P27
Drain
4SV12
P28
4SV11
Drain
Drain
Drain
Drain
P29
4SV10
Well
192
196
Cottage
MOULTON CHAPEL ROAD
2.8m
Drain
2.8m
B1357
165
Drain
Weston Fen
N

Project Title

Meridian Solar Farm

Map Title

Figure 2: Pylon Location Changes in Response to Landowner Feedback

Scale @ A3	Version	Drawn	Reviewed
1:2,500	0	RD	JC

Legend

- Order Limits
- Proposed 400kV lattice pylon (not to scale)
- Proposed 400kV overhead line
- Statutory consultation (2025) 400kV lattice pylon (not to scale)
- Statutory consultation (2025) 400kV overhead line

Notes:

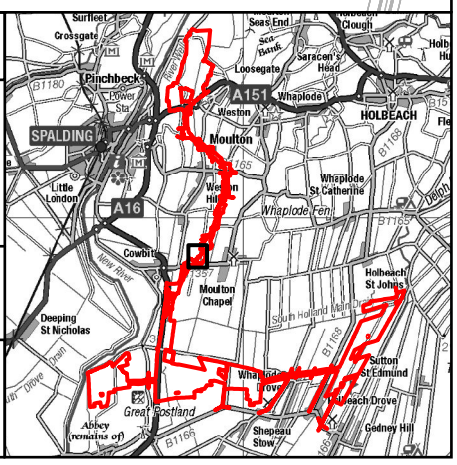
1. 4SV11 (previously P28) moved approximately 40 metres southwest.
2. 4SV12 (previously P27) moved approximately 80 metres southwest.
3. 4SV13 (previously P26) moved approximately 100 metres southwest.
4. 4SV14 represents the final pylon before the underground cabling section, beneath the existing NGED 132kV overhead line.

Date: 22/09/2026

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0 25 50 100 Metres

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5. Appendix B: Location of Indicative Construction Compounds Within Parcel B5

Meridian Solar Farm

EN010169

Volume 8

Post-Submission Application Documents

8.28 Written Summary of Oral Submissions at ISH1

Appendix B: Location of Indicative Construction Compounds Within Parcel B5

APFP Regulation 5(2)(q)

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

September 2026

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2. Works Proposed within Parcel B5 2
3. Indicative siting of the construction compounds and access track 3
4. Siting of the 132kV Underground Cable 4
5. Conclusion 4
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1. Introduction

1.1.1. This Technical Note has been prepared to accompany a new figure requested by the Examining Authority (ExA) at Issue Specific Hearing 1. Figure 1 combines sheet 3 of **Figure 2-6: Solar Development Area and Inter Array Connections Illustrative Construction Layout Plan** [APP-078] and sheet 9 of **Figure 2-7: Grid Connection Route Illustrative Construction Layout** [APP-079] to show all proposed works within Parcel B5 on one single figure. This technical note also explains the siting considerations for the proposed works adopted within the illustrative design and the reasons for flexibility sought within this area.

2. Works Proposed within Parcel B5

2.1.1. Appendix A, Figure 1 shows indicative locations for where the following works may be located within Parcel B5, south of the 400kV On-Site Substation and BESS Compound:

- Two construction compounds (one construction compound associated with the construction of the 400kV Substation and BESS Compound, and a second construction compound associated with the construction of the 400kV overhead line and pylons in the southern portion of the Grid Connection Route;
- Access track to be used during construction and operation leading up to the 400kV On-Site Substation and BESS Compound, utilising an existing access from Queen's Bank;
- 132kV Underground Cable Corridor connecting the rest of the Solar Development Area to the 400kV On-Site Substation and BESS Compound.

2.1.2. The locations of the above features as shown on the figure are indicative and subject to detailed design.

2.1.3. The siting area of the indicative construction compounds is controlled through the Work No. 16 area as shown within the **Works Plans** [APP-009 to APP-010]. Work No. 16 of Schedule 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) includes "*Works to construct temporary site compounds as part of the construction, maintenance and decommissioning of the authorised development*".

2.1.4. In addition, associated development (q) within Schedule 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) includes *'construction and decommissioning compounds, including site and welfare offices and areas to store materials and equipment*'.

2.1.5. The siting of the 132kV Underground Cable is controlled through Work No. 4: "*works to install inter-array electrical connections underground, including electrical cables, including but not limited to electrical cables connecting Works No. 3A and 3B to one another including tunnelling, boring and drilling works for trenchless crossings.*"

2.1.6. The siting of the proposed access track that passes along the western edge of Parcel B5 is controlled through associated development (b) and (c) within Schedule 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) which include works to provide access tracks and to provide access from public highway.

2.1.7. Considerations for the siting of the indicative construction compounds and 132kV Underground Cable within the western side of Parcel B5 in the Solar Development Area are provided below. Notwithstanding this, it is proposed to retain flexibility as to the final siting of proposed works at detailed design stage and commentary to this point is also provided in the following sections.

3. Indicative siting of the construction compounds and access track

3.1.1. Within Parcel B5, there is an existing access track along the western boundary of the field which provides access for agricultural machinery. This existing access track leads into an existing bellmouth from Queen's Bank and uses two existing ditch crossings. It is proposed that this existing access track along the western boundary and bellmouth from Queen's Bank is upgraded and re-used during the construction phase of the Scheme to facilitate construction of the 400kV Substation and BESS Compound and the southern portion of the 400kV Overhead Line and Pylons.

3.1.2. The indicative construction compounds were positioned towards the western side of Parcel B5 to connect into this existing access track which is proposed to service construction of the above infrastructure. This avoids the need for new access track construction and potentially new ditch crossings. In addition, as the access track would be retained during operation, locating it adjacent to the field boundary avoids severing the agricultural fields.

3.1.3. The indicative construction compound locations were positioned close to the proposed 400kV Substation and BESS Compound rather than further south in these fields to reduce the distance construction vehicles would need to travel. However, the final location of the indicative construction compounds is subject to micro siting which will be undertaken at detailed design. Hence, flexibility is sought within the **Draft DCO** (Doc Ref. 3.1 Rev 2) and **Works Plans** [APP-009 to

APP-010] at this stage to include areas to the east of the proposed indicative construction compound locations.

4. Siting of the 132kV Underground Cable

4.1.1. The illustrative design shows the 132kV Underground Cable adjacent to the location of the construction access track. However, the final location of the 132kV Underground Cable is subject to micro siting which will be undertaken at detailed design, and depend on factors including the final 400kV and BESS layout. Hence, flexibility is sought within the **Draft DCO** (Doc Ref. 3.1 Rev 2) and **Works Plans** [APP-009 to APP-010] to retain the areas to the east of the proposed 132kV Underground Cable location.

5. Conclusion

5.1.1. In conclusion, the Applicant has retained flexibility for micro-siting temporary construction works within the two fields north of Queen's Bank for the following reasons:

- The location of the 132kV Underground Cable corridor and its crossing with Queen's Bank is not fixed and subject to detailed design, may move further to the east;
- Subject to the final location of the 132kV Underground Cable corridor and where it connects into the 400kV On-Site Substation and BESS Compound, it may be possible to further micro-site the locations of the temporary construction compounds. Albeit it is noted that from the perspective of environmental effects:
    - The current indicative locations are as far possible from residential properties at Queen's Bank
    - The current indicative locations avoid areas of high potential for archaeology, as shown on **ES Figure 8-5** [APP-097].
    - Whilst the indicative locations of construction compounds are shown on Grade 1 agricultural land (see **ES Figure 5-1** [APP-088]), the temporary construction compounds would not result in permanent downgrading of agricultural land quality and the effects would be associated with temporary restriction to agricultural land use, which would be required in any case, even if the compounds were located further to the east. Restoration of

land following the construction period would be to the same grade in accordance with the measures set out within the **Outline Soil Management Plan** (Doc Ref. 7.14 Rev 1).

Appendix A: Figure 1



Project Title

Meridian Solar Farm

Map Title

Figure 1: Solar Development Area Land Parcel B5 Construction Compounds

Scale	Version	Drawn	Reviewed
1:10,000	0	LL	AK

Legend

- Order Limits
- Bellmouth
- 400kV Substation and BESS Construction Compound
- 400kV Overhead Line Construction Compound
- Underground Cable Corridor
- Construction Access Swathe
- 400kV Substation and BESS Compound

Date: 11/09/2026

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