PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION BY MERIDIAN SOLAR FARM LIMITED FOR A DEVELOPMENT CONSENT ORDER

WRITTEN SUMMARY OF ORAL SUBMISSIONS

ON BEHALF OF

NATIONAL GRID ELECTRICITY TRANSMISSION PLC

ISSUE SPECIFIC HEARING 1 – 9th SEPTEMBER 2026

Introduction

1. This written summary of oral submissions at Issue Specific Hearing (**"ISH"**) 1 is submitted on behalf of National Grid Electricity Transmission Plc (**"NGET"**) in respect of the Development Consent Order (**"DCO"**) application for the proposed Meridian Solar Farm (**"Project"**) made by Meridian Solar Farms Limited ("**Applicant**").

2. NGET owns, operates and maintains the high-voltage electricity transmission network in England and Wales (**"NETS"**). NGET operates under a transmission licence issued by the Office of Gas and Electricity Markets (**"Ofgem"**) and is subject to its duties under the Electricity Act 1989.

3. These submissions should be read in conjunction with NGET's relevant representation [**RR-138**] and written representation to be submitted at Deadline 1, which address in detail the matters raised at ISH1.

4. ISH1 addressed, under Agenda Items 4 and 6, the scope of the Project and the Project's interrelationship with other projects, including NGET's proposed Grimsby to Walpole DCO and the proposed Weston Marsh A and B substations (together the "**NGET Projects**").

5. NGET's submissions at ISH1 addressed four principal matters:

    (a) the absence of a confirmed grid connection offer for the Project;

    (b) the interrelationship between the Project and the NGET Projects;

    (c) physical interfaces and proximity to NGET infrastructure; and

    (d) the principle of protective provisions for NGET

Grid Connection Offer

6. NGET submitted that the Project has no connection offer at any location, whether that be at Weston Marsh A or B or any other location. The Applicant has a Gate 1 notification from the National Energy System Operator ("**NESO**").

7. Receiving a Gate 1 notification means that a project can remain in the connections process, but it does not reserve capacity, a place in the queue, provide protected status, or guarantee a connection. To progress, customers must submit a Gate 2 application during an application window (typically held every six months) and meet the prescribed evidence requirements to be eligible for a place in the connections queue.

8. Where a Gate 1 notification is received, the relevant transmission owner for a project, in this case NGET for the Project, will stop progressing any applicable transmission works where those works are no longer required (i.e. substation and capacity reallocation may continue where needed for current Gate 2 projects or they are economically advantageous for future need; but the works will not be completed for the sole benefit of the Gate 1 project specifically).

9. A Gate 1 outcome will remain in place until a customer either reapplies in a future connections application window and meets the criteria for Gate 2, or a customer chooses to terminate its project. In either case, the project will not progress into delivery under the reformed connections pipeline at this time. NESO makes this clear on its website, and this is precisely the circumstances that we have here.

10. As such, it cannot be guaranteed that there would be a connection at any particular location. A connection could be located at Weston Marsh, or it could be anywhere else. There is simply no way to tell at this stage where the connection may be. From NGET's point of view it is premature to assume a connection at any particular location or at all.

11. The Applicant is a volunteer and not compelled to make a DCO application at this stage. The "difficult situation" in relation to its grid connection of which the Applicant complains is entirely of its

own making. It is not appropriate for the Applicant to attempt to force the hand of a regulated electricity transmission owner and NESO by seeking to drive a grid connection to a location where there is no offer of the connection being effected. The Applicant may once have benefited from a connection offer, but that is no longer the case and the location at which the connection is sought in the DCO application does not in any case reflect the connection location in the offer that the Applicant once held. The Gate 1 offer in no way *grandfathers* the connection location.

12. Where it is aggrieved as to a Gate 1 outcome, a prospective connectee does have means of seeking to resolve this. First, as noted above, it may make an application for Gate 2 status within the relevant application window(s). Alternatively, the correct approach for the Applicant to take would be to appeal the grant of only a Gate 1 offer as opposed to a Gate 2 offer to NESO. It is then for NESO to resolve that on behalf of the Applicant. That is the appropriate forum for resolving this issue before taking steps which interfere with NGET and its undertaking.

13. In this particular case, it should be borne in mind that the reason for the Gate 1 offer is not affected by the physical availability or otherwise of a grid connection or the presence of transmission infrastructure. Rather, NGET is informed that the stated reason for a Gate 1 offer in this instance is what is described by NESO as *strategic alignment*. This is a matter entirely for NESO and which must be addressed by the Applicant if it is to receive a Gate 2 offer.

14. NESO will have considered a number of factors when determining Gate results, one of which was strategic alignment. It is NGET's understanding that the strategic alignment conditions required under NESO's methodology and affecting the Project's application for a grid connection are not met. Here, it is understood that neither the BESS, nor solar components of the Project satisfy NESO's strategic alignment criteria.

15. It is NGET's position that the grid connection proposed by the Applicant is entirely presumptive and should not be authorised.

Interrelationship with NGET Projects

16. NGET further submitted that the examining authority should not assume that NGET is in any way satisfied that the Project and the NGET Projects can be accommodated in the same location or the same environment. NGET is not satisfied that the Applicant's proposed infrastructure can be accommodated in close proximity to NGET's proposed infrastructure, particularly where there is potential paralleling of overhead lines.

17. As a responsible statutory undertaker and Transmission System Owner, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. In particular, NGET is obliged by its licence under the Electricity Act 1989 to comply with the NETS Security and Quality of Supply Standard ("**SQSS**"), which governs *inter alia* the physical characteristics of its infrastructure and its performance. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the Meridian Solar Project's draft Order Limits. Additionally, NGET must protect its ability to deliver, operate, and maintain its future proposed infrastructure and apparatus.

18. The Project may impede delivery of the nationally significant NGET Grimsby to Walpole Project, which has a wider importance in terms of delivery, and for which NGET will bring forward the application for the Grimsby to Walpole DCO in 2027.

19. While design workshops took place with the Applicant in late 2025 and NGET agrees those discussions were constructive in tone, they have come to an end. Since November 2025, there have been material changes in circumstance; the Applicant's connection agreement, dated 21 September 2023, was replaced by a Gate 1 offer with no identified location. Further, as noted above, NGET is not progressing discussions with the Applicant given that it has no Gate 2 connection offer. The circumstances in 2026 are simply different to those in 2025. In any event, no technical solution to interfaces was identified or secured.

20. There is no justification for authorising a connection which has no endpoint.

Physical Interfaces and Proximity

21. NGET has raised technical concerns about pylon height and proximity to NGET's infrastructure. As noted above, NGET is required to comply with the SQSS, which governs matters such as physical separation of overhead lines.

22. As discussed in ISH 1, where pylons are close together in a parallel formation, it is not just a question of ground clearance but also lateral separation between the two lines – the horizontal distance from each other. As pylons move apart or get higher, the sag of the conductor increases, and in wind conditions there is greater swing, bringing lines closer together.

23. The Project proposes a 13 km 400 kV overhead line from the proposed solar farm to Weston Marsh and assumes that their overhead line can be routed through land that will also accommodate NGET's Grimsby to Walpole overhead line. The Project proposal assumes instances of the overhead lines of the two projects running in parallel – indeed, what is termed "close paralleling".

24. NGET's design work has identified that the separation between the two projects is less than the required stand-off distance set out in National Grid's Technical Specification Generic Design Principles for Overhead Lines TS2.04 Issue 6 (2021). These stand-off distances are required to allow for asset maintenance and general safety.

25. The required standoff for a 55.5 metre tower is 92.25 metres, but the anticipated separation is only 75 metres, which is materially lower than the standard requires. This would be exacerbated by higher pylons; indeed, during ISH1, the Applicant advised of the potential for pylons to be as tall as 66 metres in this location, which would worsen the failure to comply with the Technical Standard yet further.

26. The Project's current design would result in operations inside this stand-off distance. This would impede NGET's future ability to operate and maintain its assets in a safe manner. The current design would result in a residual hazard that NGET would be left to manage for the operational life of its asset.

27. NGET is a licensed transmission system owner obliged to comply with technical standards, including those set out above, and the SQSS. The Applicant is not such an owner or operator and does not have the same duties placed upon it, meaning that it cannot be assumed that it (or its future owners or successors) would maintain the infrastructure it had built in the same manner as NGET. Therefore, maintaining separation standards is critical to protecting NGET and its undertaking.

28. Further information will be provided in NGET's written representation at Deadline 1.

Protective Provisions

29. NGET confirmed that it is entirely appropriate and proper for the Applicant to offer protective provisions to NGET, and that NGET will consider those and engage constructively with them.

30. However, this is without prejudice to NGET's general position that the grid connection should not be authorised in this configuration or at all. NGET does not consider protective provisions to cure the problems inherent in the application.

31. Should the Project go ahead, the protective provisions would govern how it is operated, but NGET's position remains that connecting the grid connection for the Project should not be authorised.

Way forward

32. Further details on technical matters, including proximity and standoff distances, will be provided in writing at Deadline 1.

DLA Piper UK LLP

22 September 2026