Please find attached our deadline 1 submission.

We must also declare that AI tools were used to assist with structuring, drafting and proofreading this submission. The underlying concerns, evidence, questions and conclusions are LAND担 own.

ChatGPT/Copilot/Gemini may have been used by various members of the team working on our submission

Regards

[redacted]

LAND

LETTERHEAD SPACE

Meridian Solar Farm Written Submission at Deadline 1

Application reference EN010169

Submitted by	[redacted]
Organisation	LAND Lincolnshire Against Needless Destruction
Examination reference	[redacted]
Deadline	Deadline 1 22 September 2026
Status	Working draft for review

Purpose of this submission

This submission supplements LAND's oral contribution at Open Floor Hearing 1 and addresses matters arising from Issue Specific Hearing 1. It focuses on the reliability and transparency of the Applicant's land use and employment claims, the present uncertainty surrounding the grid connection, cumulative effects, coordination with other infrastructure promoters, and the effect of repeated overlapping proposals on community participation.

LAND asks the Examining Authority to require the Applicant to provide the underlying evidence, assumptions and calculations needed to test its claims. Where essential matters remain unresolved, those uncertainties should be reflected in the weight given to the claimed benefits and in any assessment of whether the Scheme is sufficiently developed and deliverable to justify consent and compulsory acquisition powers.

Community participation and planning fatigue

LAND refers the Examining Authority to the oral submission made on its behalf at Open Floor Hearing 1 concerning planning fatigue and the cumulative pressure being experienced by Lincolnshire communities.

LAND wishes to emphasise that the relatively small number of residents speaking at the hearing should not be interpreted as evidence of community acceptance or approval. Residents are attempting to understand and respond to multiple overlapping solar, transmission, substation, battery storage and other infrastructure proposals, frequently promoted by different organisations through separate consultation and examination processes.

The resulting complexity, repeated consultations, technical documentation and uncertainty about how the different projects interact have left many residents confused and overwhelmed. Some no longer know which developer, consultation or examination is responsible for a particular element of infrastructure. Others lack the time, confidence or technical knowledge required to participate repeatedly.

Silence in those circumstances is not necessarily consent. It may equally reflect consultation fatigue, uncertainty and a loss of confidence that individual participation will influence the overall pattern of development. LAND asks that the quality and accessibility of engagement, together with the cumulative demands placed upon affected communities, are considered rather than treating attendance or speaker numbers as a measure of public support.

Agricultural land and cumulative land use

At Open Floor Hearing 1 the Applicant stated that, cumulatively, solar projects in Lincolnshire would account for approximately 3 per cent of all agricultural land in the county, that an estimated 1.1 per cent of BMV land would be used temporarily, and that 0.02 per cent of BMV land would be used permanently. The Applicant concluded that solar schemes therefore represent a small proportion of agricultural and BMV land in Lincolnshire.

Those figures differ from LAND's own cumulative work and cannot be tested from the information presented at the hearing. The burden rests upon the Applicant to demonstrate how its figures were derived and why the selected denominator and methodology provide a meaningful assessment of cumulative effects.

Information required on the land calculations

The Applicant should provide the complete calculation underpinning each percentage, including:

- the projects included and excluded, with the status and assessment date for each project;
- the acreage attributed to each project;
- whether Order Limits, solar development areas, panel areas or permanent operational footprints were used;
- the total agricultural land and BMV land denominators;
- the treatment of grid connections, substations, battery storage and associated development;
- the treatment of overlapping project areas and projects that may represent alternative connection arrangements;
- the source and date of each agricultural land classification figure;
- the treatment of undivided Grade 3 and land not subject to detailed survey; and
- the basis for describing affected BMV land as temporary rather than permanently lost or materially reduced in productivity for the operational period.

Until that information is supplied, the percentages should **not** be treated as reliable evidence that the cumulative effect is small. A county-wide denominator may obscure the much greater concentration of development within particular districts, farming areas and communities. It does not establish the proportion of Meridian's own solar development area that is BMV, the productive output displaced, or the consequences for individual farms and the local agricultural economy.

Temporary use and restoration

The Applicant described most of the land impacts as temporary, including long term temporary use of the solar development area. A 40 year operational period is nevertheless an entire farming generation and cannot be treated as a short interruption merely because land may eventually be returned to a landowner.

The Examining Authority's action points require the Applicant at Deadline 1 to confirm whether agricultural land would be restored to its original agricultural land classification grade, how that would be secured, and the implications for productivity if restoration is not possible. Lincolnshire County Council also questioned at Issue Specific Hearing 1 whether the claimed agricultural recovery would actually occur, notwithstanding the Applicant's reliance upon recovery and continued livestock grazing as a benefit.

Accordingly, restoration and retained productivity are matters awaiting evidence. Until the Applicant demonstrates that original grade and productive capability can be restored and secured, the use of the word temporary should not be allowed to stand in place of an assessment of the duration and agricultural consequences of the Scheme. Continued or possible sheep grazing is not equivalent to maintaining the productive arable farming displaced.

Sheep grazing and animal welfare

The Applicant has referred to sheep grazing as a continuing agricultural use of the solar development area. That assertion requires a detailed and deliverable grazing and animal welfare plan. A general statement that sheep may graze the site does not demonstrate how livestock husbandry would operate safely alongside panels, electrical equipment, security fencing, drainage features, maintenance activity and emergency access.

LAND requests that the Applicant provide a site-specific grazing strategy addressing:

- which parts of the Order limits would be available for grazing, identifying whether sheep would graze beneath and between panels, only around field margins and perimeter areas, or within separately secured grazing compartments;
- the anticipated usable grazing acreage, the proposed number of sheep, the stocking rate per acre or hectare, and how that rate would vary by season, weather, grass growth and ground conditions;
- the breeds and ages considered suitable for the panel layout, fencing, ground conditions and any year-round outdoor management system;
- whether sheep would remain outdoors throughout the year and, if not, where they would be housed during winter or periods of extreme weather, flooding, construction, maintenance or poor ground conditions;
- whether breeding stock would be kept on site and, if so, where and how mating, pregnancy checks, lambing, isolation and care of ewes and newborn lambs would be managed;
- the identity and competence of the livestock owner, registered keeper and day-to-day stockperson, including who would hold the relevant holding and livestock movement registrations and who would carry legal responsibility for welfare;

- the arrangements for routine inspection, veterinary treatment, shearing, foot care, parasite control, fallen stock, humane isolation and the safe catching, handling, loading and movement of animals;
- the location and design of handling pens, loading areas, shelters, water troughs, supplementary feed and bedding stores, together with secure vehicle access for farmers, vets and livestock transporters;
- how a reliable supply of clean drinking water would be maintained across the grazing areas, including during freezing weather, drought, power loss or damage to site infrastructure;
- how supplementary feed would be stored and distributed without attracting vermin, obstructing access, damaging soils or creating conflict with electrical and fire-safety requirements;
- how sheep would be protected from contact with electrical equipment, cables, sharp edges, moving components, maintenance machinery, security fencing, contaminated runoff and any substances used for vegetation control or panel cleaning;
- the fencing, compartmentalisation and monitoring arrangements needed to prevent escape, entrapment, theft, dog attacks and unauthorised public contact, particularly where public rights of way pass through or beside the site;
- the biosecurity arrangements for livestock movements between the Scheme and other holdings, including disease control, quarantine and cleansing of vehicles and equipment;
- the contingency plan for fire, flooding, extreme heat, severe cold, drought, equipment failure or another emergency, including warning procedures, evacuation routes, temporary holding areas, transport capacity and the person authorised to order and manage an evacuation; and
- how these commitments would be secured, monitored and enforced throughout the operational life of the Scheme, including what would happen if grazing became commercially or practically unviable.

The Applicant should also distinguish clearly between the gross solar development area and the acreage that would genuinely remain accessible and suitable for livestock. Grazing around infrastructure or on small residual areas should not be used to characterise the whole site as remaining in productive agricultural use. Unless these matters are specified and secured, proposed sheep grazing should be given little weight as mitigation for the displacement of existing arable production.

Employment and the claimed net gain of 11 jobs

The Applicant predicts 10 net direct operational full time equivalent jobs, rising to a net gain of 11 full time equivalent jobs after applying additionality assumptions. Its own evidence indicates that only five of those jobs are likely to arise within the study area and describes the resulting operational employment effect as long term negligible beneficial and not significant.

The figure cannot properly be presented as a net employment gain unless existing employment and economic activity displaced by the Scheme have first been identified and deducted. The Applicant should disclose the full calculation and demonstrate:

- how 10 direct operational jobs become a net gain of 11 jobs;

- the displacement, leakage and multiplier assumptions applied;
- the existing agricultural employment baseline for the affected farms;
- whether farm employees, tenants, contractors and seasonal workers were included;
- whether indirect employment in agricultural machinery, haulage, agronomy and agricultural supply chains was assessed;
- the evidence supporting any assumption that no agricultural employment would be lost or reduced;
- whether the jobs are genuinely additional, permanent and local rather than transferred from elsewhere; and
- the outcome of sensitivity testing in which existing agricultural employment and associated supply chain activity are displaced.

Without that information, the Examining Authority cannot determine whether the 11 job figure represents a genuine net benefit or simply the result of assuming that no existing agricultural employment will be affected.

Grid connection status and realistic delivery

The Applicant's Grid Connection Statement confirms that Meridian received a Gate 1 offer indicating an initial connection year post 2035 and intends to reapply for Gate 2 in a future application round. Meridian therefore does not presently have confirmed Gate 2 capacity or a secured connection date.

Despite that position, the Environmental Statement assesses the Scheme using a 2033 grid connection date. The Grid Connection Statement relies upon the absence, at the time it was prepared, of a formal change by National Grid Electricity Transmission to the earlier 2033 completion date for Grimsby to Walpole. These positions are not reconciled. The Applicant's current offer is post 2035, while its assessment of effects and benefits assumes connection in 2033.

LAND understands that more recent National Grid programme information identifies a deterministic date in 2034 and a P50 date in October 2034 for Grimsby to Walpole. A P50 date is a central probabilistic forecast, not a guaranteed completion date. It indicates an equal probability of delivery falling later. Even completion of the wider reinforcement would not necessarily mean that Meridian could immediately export electricity. Weston Marsh B, the relevant generator bay, protection systems and Meridian's own connection works would need to be designed, consented where necessary, constructed, tested and commissioned.

Information required on connection and programme

The Applicant should provide or obtain from the relevant network bodies:

- the latest deterministic, P50 and later confidence delivery dates for Grimsby to Walpole;
- a precise definition of the milestone represented by each date;
- the forecast completion, commissioning and energisation dates for Weston Marsh B;
- confirmation of whether a Meridian generator bay is included within the current design and programme;

- the expected period required after network completion for testing, commissioning and first export;
- the latest critical path programme linking Grimsby to Walpole, Weston Marsh B, the generator bay and Meridian's own works;
- evidence that 750 MW export and 350 MW import capacity will be available to Meridian;
- the anticipated timing and qualifying evidence for Meridian's intended Gate 2 application;
- the contingency if Gate 2 is refused, deferred or offers a later or alternative connection; and
- realistic earliest, P50 and reasonable worst case dates for Meridian's first export.

On the currently available evidence, a connection during 2035 may be an aspiration but is not an established or secured outcome. Meridian's present Gate 1 position is post 2035, the necessary substation remains part of a separate unconsented project, the network programme carries delivery uncertainty, and no Gate 2 capacity has been confirmed. Claimed benefits and the assessment programme should therefore be tested against realistic alternative connection scenarios rather than the unsupported 2033 assumption.

Cumulative development and coordination

LAND was unable to address cumulative impacts during Issue Specific Hearing 1 and therefore places the following matters on the examination record.

Meridian cannot properly be assessed as an isolated solar development. Its solar areas, battery storage, substation and approximately 13 km grid connection sit within an area already affected by existing and proposed solar developments, substations, overhead lines, underground connections and the separate Grimsby to Walpole project.

The relevant question is not simply whether each individual project has been listed in a cumulative effects schedule. The Applicant should demonstrate whether timely and meaningful coordination has taken place to reduce the combined infrastructure imposed upon the landscape, agricultural land, transport network and communities.

Information required on coordination

The Applicant should provide:

- the developers and infrastructure promoters with whom it has engaged;
- the dates, scope and results of that engagement;
- a combined plan showing Meridian alongside relevant solar, transmission and substation projects;
- evidence that shared access routes, construction compounds, cable corridors, overhead line corridors and other infrastructure have been investigated;
- an assessment of whether Meridian's connection could share or consolidate infrastructure with another project;
- the technical, environmental or commercial reasons for rejecting each potential shared solution;
- the proposed coordination of simultaneous or consecutive construction programmes;

- the arrangements for managing cumulative traffic, drainage, agricultural, landscape and community effects across project boundaries; and
- the binding mechanisms that would secure cooperation rather than leaving it dependent upon future voluntary discussions.

LAND is concerned that essential coordination appears to be continuing after Meridian's design and Order Limits have already been submitted. Meaningful coordination should inform site selection, route selection, environmental assessment and scheme design before development consent and compulsory acquisition powers are sought. If cooperation is postponed until after consent, the examination cannot know whether shared or consolidated infrastructure was genuinely feasible, whether cumulative harm could have been avoided, or whether subsequent changes would require further land, additional permissions or material amendments.

Unresolved relationship with Weston Marsh

The Applicant's own Grid Connection Statement demonstrates that the physical connection remains unresolved. Meridian proposes to connect to Weston Marsh B, while National Grid's initial designs have shown Meridian connecting to Weston Marsh A. The parties continue to develop the design and the Applicant acknowledges that further planning permission or a material change to the DCO may be required if its proposed connection cannot be accommodated.

This is not a minor post consent construction detail. It may affect the connection route, land requirements, cumulative effects, compulsory acquisition case and deliverability of the Scheme. The Applicant should explain why these matters were not resolved before the DCO application was submitted and why extensive land and compulsory acquisition powers should be granted while the connection design remains under negotiation.

The examination should not accept a collection of individually promoted schemes with cooperation promised later. The Applicant must demonstrate that Meridian has been planned as part of the developing energy system around it, that opportunities to share or consolidate infrastructure have been properly explored, and that avoidable duplication will not be imposed upon communities merely because commercial projects progressed separately.

Requested response and examination action

LAND respectfully asks the Examining Authority to:

1. Require the Applicant to disclose the calculations, datasets, denominators and project lists supporting its cumulative agricultural land and BMV percentages.
2. Require the Applicant to submit a site-specific, enforceable grazing and animal welfare strategy demonstrating the land genuinely available to livestock and how year-round husbandry and emergency arrangements would operate.
3. Require the Applicant to provide the complete employment calculation and evidence supporting any assumption of zero agricultural employment displacement.
4. Require the Applicant to reconcile the 2033 Environmental Statement assumption with its Gate 1 post 2035 position and provide realistic alternative connection scenarios.

5. Require clear evidence from the Applicant and relevant network bodies concerning Gate 2 status, network capacity, Weston Marsh design, programme dependencies and realistic energisation dates.
6. Require evidence of pre application coordination with other developers and an assessment of opportunities for shared or consolidated infrastructure.
7. Give limited weight to claimed land restoration, employment, energy and timing benefits until the outstanding assumptions and dependencies have been evidenced and tested.
8. Consider whether the present uncertainties are compatible with granting the extensive land and any compulsory acquisition powers sought.

Conclusion

LAND supports a necessary and properly planned transition to a secure low carbon energy system. That transition must be based on balanced land use, transparent evidence, credible delivery programmes and genuine coordination between projects. Meridian's application presently relies upon cumulative land figures that have not been made transparent, a net employment claim whose displacement assumptions require examination, and a connection programme that is not supported by a confirmed Gate 2 offer.

The same pattern is visible in the unresolved relationship between Meridian's proposed connection and National Grid's evolving Weston Marsh design. Consent should not be used to defer essential evidence and coordination until after the principal decisions and land powers have been granted.

LAND therefore asks that the Applicant be required to answer the questions raised in this submission fully and transparently, and that unresolved uncertainty be reflected in the weight given to the claimed benefits and in the overall planning balance.

Principal documents referred to

- EN010169 000489 Meridian Solar Farm Open Floor Hearing 1 Transcript 8 September 2026.
- EN010169 000497 Meridian Solar Farm Issue Specific Hearing 1 Transcript Session 3 9 September 2026.
- EN010169 000492 Action Points from Issue Specific Hearing 1 Strategic Matters.
- EN010169 000132 Meridian Solar Farm Grid Connection Statement March 2026.
- EN010169 000348 Environmental Statement Chapter 10 Human Health March 2026 including the operational employment evidence cross referring to Environmental Statement Chapter 14.

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LAND Lincolnshire Against Needless Destruction
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