SUBMISSION BY THE MERIDIAN ACTION GROUP

REGISTRATION IDENTIFICATION NUMBER: FC94001AB

MAG COMMENT ON Meridian Solar's plans and the impact on water use and supplies

1. Water Resources Assessment / peak demand

Anglian Water identifies the Scheme as lying within its **Lincolnshire Bourne Water Resource Zones** and describes the region as **"seriously water stressed"**, referring to abstraction reductions, climate change and population growth.

Anglian Water raised the need for a **Water Resources Assessment (WRA)** for significant non-domestic demand, demonstrating that supply is **deliverable and sustainable**, with demand identified for different stages of the development.

MAG has been unable to identify a comprehensive WRA covering construction, operation and decommissioning.

Points to establish:

- Has the WRA sought by Anglian Water been provided?
- What is the maximum simultaneous demand in **m^3/day**, particularly during construction?
- Does maximum construction demand exceed **20 m^3/day** and, if so, where has this been assessed?
- What reasonable worst-case demand has been assessed during prolonged hot/dry conditions?

2. Construction – quantity and source

Meridian identifies construction water requirements including dust suppression, wheel washing, washing/cleaning, concrete production/curing, internal roads, compounds and workforce welfare.

Commercial/tankered supplies are proposed rather than reliance on Anglian Water mains unless separately agreed.

MAG has been unable to identify:

- total construction water demand;
- maximum simultaneous daily demand;

- peak demand during prolonged dry weather;
- the underlying source(s) of commercial/tankered supplies.

Points to establish:

- Total construction requirement and peak m^3/day.
- Primary source of each commercial supply – Water Resource Zone, licensed abstraction or other source.
- Evidence that suppliers have capacity to meet the required **peak**, rather than average, demand.
- Availability under drought conditions.
- What assumptions concerning source/availability are secured through the DCO.

Key point: identifying tanker/commercial delivery does not identify or demonstrate the sustainability of the underlying water resource.

3. Agricultural irrigation reservoir

Meridian identifies an **agricultural irrigation reservoir** as a possible source for construction dust suppression.

Points to establish:

- Which reservoir is contemplated?
- Storage capacity and/or associated abstraction licence.
- Existing agricultural requirement.
- Residual capacity actually available to Meridian.
- Whether concurrent agricultural irrigation and Meridian dust-suppression demand during dry conditions has been assessed.

This appears particularly relevant because the circumstances likely to increase construction dust-suppression demand may also increase agricultural irrigation demand.

4. Operational panel cleaning

Meridian's ES Chapter 2 anticipates approximately **1,128,667 panels**.

Annual washing assumption:

3 m^3/1,000 panels = approximately 3,386 m^3/year (3.386 million litres).

Meridian states that washing would use clean water without added chemicals, **"sourced from local potable water suppliers."**

For context only, applying Meridian's annual assumption throughout 40 years gives approximately **135.4 million litres** (MAG calculation, not an Applicant figure).

Points to establish:

- Evidence supporting availability of 3,386 m³/year from local potable-water suppliers throughout operation.
- Identification of the underlying source/resource.
- Assessment of rainwater harvesting, recycled water or suitable non-potable alternatives.
- Operational arrangements during drought restrictions/water-resource constraints.
- DCO mechanism securing any water-efficiency or alternative-source commitments relied upon in the assessment.

I would give greater weight to the **3,386 m³/year, source and resilience** than to the 40-year cumulative figure.

5. Decommissioning

The Outline Decommissioning Environmental Management Plan anticipates water use for matters including dust suppression, damping earthworks, wheel washing and equipment/site cleaning.

MAG has been unable to identify:

- total decommissioning water demand;
- peak daily demand;
- identified underlying source.

Meridian also anticipates hotter/drier conditions and increased dust-suppression use during heatwave/drought conditions.

Points to establish:

- Reasonable worst-case decommissioning water requirement.
- Maximum simultaneous demand in m³/day.
- Assumed underlying source and evidence of availability.
- Drought scenario.
- Secured use of non-potable/recycled sources where appropriate.

Specific point: if no quantitative assumption has been made for decommissioning water demand, on what basis have the water-resource effects of decommissioning been assessed?

6. Whole-life assessment / matters deferred

MAG has been unable to identify a single quantified assessment bringing together:

Construction

- total demand;
- peak m^3/day;
- source.

Operation

- annual demand;
- source;
- drought arrangements.

BESS

- total fire-water storage;
- initial fill;
- replenishment following use;
- source.

Decommissioning

- total demand;
- peak m^3/day;
- source.

Across all phases, the outstanding matters appear to be:

- primary water source rather than delivery method;
- peak rather than average demand;
- drought resilience;
- cumulative effects;
- enforceability of mitigation/source assumptions.

The central issue for consideration is therefore:

What is the maximum simultaneous daily water demand for each phase of the Scheme; what underlying water resource will meet that demand; and where is the availability and sustainability of that supply demonstrated and secured?

Where source, quantity or availability is left to detailed design/post-consent agreement, the related issue is whether sufficient information is presently available to support the conclusions reached in the environmental assessment.

Subsidiary points

Water tanker movements

If commercial tankering forms part of the supply strategy:

- tanker capacity assumed;
- deliveries/day at peak water demand;
- corresponding two-way HGV movements;
- inclusion within Transport Assessment assumptions;
- equivalent assessment for decommissioning.
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BESS firefighting provision

Keep separate from routine consumption, but establish:

- total storage requirement across all BESS areas;
- source for initial fill;
- source for replenishment following an incident;
- inclusion within overall water-resource assumptions.

SUMMARY KEY ISSUES

1. **Absence/adequacy of WRA and peak construction demand**
   2. Underlying source of commercial/tankered water
   3. Agricultural reservoir capacity/competing demand
   4. 3,386 m³/year panel-cleaning supply and drought resilience
   5. Unquantified decommissioning demand
   6. Extent to which material water-resource matters are deferred post-consent important distinction between matters that can reasonably be dealt with later and information needed now to demonstrate the environmental acceptability and deliverability of the scheme before consent is granted

The common thread is:

quantified demand → underlying source → demonstrated availability → drought resilience → secured mitigation.

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Note AI was use in search of this issue (GPT) but not in the writing of the submission