



Meridian Solar Farm

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Volume 8

Post Submission Application
Documents

8.32 Applicant's Comments on
Written Representations

APFP Regulation 5(2)(q)

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1. Introduction

1.1. Overview

- 1.1.1. This report provides Meridian Solar Farm Limited's (the 'Applicant') response to the matters raised in the Written Representations submitted by Interested Parties concerning Meridian Solar Farm (the Scheme).
- 1.1.2. The Written Representations expand upon the points raised by Interested Parties within their Relevant Representations. A total of 29 Written Representations were received at Deadline 1.
- 1.1.3. All Written Representations have been responded to by setting out the Applicant's position on the matter at the time of writing. In some cases, the Applicant has previously responded to these points within the **Relevant Representations Report** [REP1-047]. Where this is the case, and no new or different points are raised, the Applicant has cross-referred to the relevant section of that report rather than reproducing the response in full.
- 1.1.4. Likewise, where matters are already covered within a Statement of Common Ground (SoCG) with an Interested Party, the Applicant has not reproduced those responses, and has cross-referenced to the relevant SoCG.

1.2. Structure

- 1.2.1. This document has been structured alphabetically by Interested Party. In some cases, the volume of matters raised were too large for inclusion in the body of the report, and responses to these issues have been provided at Appendix A. Where this is the case for an Interested Party, it is set out in Section 2 below.

2. Applicant's Response to Written Representations

2.1. Overview

- 2.1.1. The following section provides a response to each of the Written Representations received.

2.2. Andrew Malkin [REP1-120]

- 2.2.1. With regards to the comments on the number of jobs supported by the Solar Development Area currently, as set out in **ES Chapter 14: Socio-Economics and Land Use [APP-065]**, the Solar Development Area is farmed by landowners who have voluntarily included land within the Scheme. Hosting of the Scheme is a form of diversification for the owners of agricultural land holdings, and will provide an alternative income to farming. There are no tenant farmers on the Solar Development Area who would lose their jobs. There may be some contractors who undertake some farming activities on the land, but such contractors would not be entirely reliant on these farms for employment, and so no Full Time Equivalent (FTE) jobs have been attributed to these activities within the calculation of existing operational employment. Within the Inter-Array Connections and the Grid Connection Route, disruption to farming activities would largely be temporary and short term only, so no loss of employment in this part of the Scheme is expected. The assumption that zero FTE direct agricultural jobs would be lost due to the change in land use is based on the Applicant's understanding of existing activities and their discussions with the landowners in question, rather than the application of theoretical benchmarks. This is considered a sound and reasonable approach.
- 2.2.2. It is not clear how the conclusion reached by Mr Malkin that 337 FTE indirect jobs are supported by current agricultural uses on the Solar Development Area has been reached based on the DEFRA Standard Labour Requirements dataset. As noted above, the assumptions used within the assessment of operational phase employment impacts derive from the Applicant's understanding of existing activities and their discussions with the landowners in question, rather than the application of theoretical benchmarks. It is assumed that the reference to a £80 million economic loss relates to the Lincolnshire County Council (LCC) Local Impact Report [REP1-106], which states that the potential gross agricultural output achievable for the 1,064 hectares within the solar development area is estimated at £57.24 million and £76.16 million over the 40

year operational period of the Scheme, and that this value would be lost to the local economy.

2.2.3. As noted within the **Applicant's Response to the Local Impact Reports** (Doc Ref. 8.33), RAC's estimate indicates the revenue which could be raised by the crops if they were sold. It is not accurate to state that this is the value which would go into the local economy. Gross output does not reflect the costs of production (including fuel, fertiliser, seed and machinery), and a substantial proportion of spending on these items would go outside the local area. While some of the crops may be sold and consumed locally, it is likely that much of the produce will be transported outside of Lincolnshire to retailers and wholesalers based elsewhere in the country. The sum of £57.24 million to £76.16 million is therefore not a robust representation of the net economic effect of the Scheme on the local economy. There is no precedent within recent DCO applications for solar schemes for using this approach.

2.2.4. In response to the other comments made by Mr Malkin in his submission, the Applicant has provided responses to these issues in various documents submitted into examination. Specifically:

- Use of Best and Most Versatile (BMV) land, see Section 6.2 Agricultural Land of the **Relevant Representations Report** [REP1-047].
- Construction traffic and capacity of existing roads to accommodate construction traffic, see Section 6.31 Traffic and Access of the **Relevant Representations Report** [REP1-047].
- Assessment of fish, see Section 3.5 of the **Relevant Representations Report** [REP1-047], comments EA24 to EA30.
- Operational noise, see Section 2.2 of the **Relevant Representations Report** [REP1-047], comments SHDC-038 to SHDC-040.
- The need for the Scheme, see Section 6.27 Planning Policy and Need of the **Relevant Representations Report** [REP1-047].
- The status of the Applicant's grid connection offer, see Section 6.16, Grid Connection and OHL of the **Relevant Representations Report** [REP1-047].
- Further clarification on the reinstatement of agricultural land was submitted within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099] submitted at Deadline 1.

- Further clarification on the community benefit fund was submitted at Deadline 1 within **Post ISH1 Note - Community Benefit Fund** [REP1-100] .
- Further information on Site selection has been submitted at Deadline 2 within **Post ISH1 Note: Strategic Site Selection** (Doc Ref. 8.35).
- **Water Supply Strategy** (Doc Ref. 8.37) has been submitted at Deadline 2 and the Applicant will continue engagement on these matters with Anglian Water Services and the Environment Agency.

2.3. Cadent Gas Ltd [REP1-111]

- 2.3.1. The Applicant notes Cadent Gas Ltd's comments. The **Draft DCO** [REP1-006] already includes standard protective provisions for the protection of gas undertakers at Schedule 13, Part 1. The Applicant therefore does not agree that its approach is inconsistent with the guidance referred to by Cadent Gas.
- 2.3.2. The Applicant is actively engaging with Cadent Gas regarding bespoke protective provisions for its apparatus. Negotiations are ongoing and, once agreed, the protective provisions will be incorporated into a subsequent version of the Draft DCO.

2.4. Carlton Lane [REP1-121]

- 2.4.1. In response to the points raised by Mr Lane in his submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land.
 - Cumulative effects of multiple energy projects across Lincolnshire, including projects by NGET, see Section 6.10 Cumulative Effects.
 - Siting of construction access roads, see Section 6.7 Construction Methodology.

2.5. Catriona Jibb [REP1-122]

- 2.5.1. The Applicant notes Ms Jibb's preference for the use of industrial buildings and creating solar panel canopies for car parks. While the Applicant agrees that the siting of solar panels on rooftops, car parks, brownfield sites, etc. are beneficial and also contribute to decarbonisation of the energy sector, this typology is not

at a scale suitable for the delivery of utility scale energy generation to support decarbonisation of the wider electricity network at a national level. Further discussion on this point is set out in the **Relevant Representations Report [REP1-047]** at Section 6.4 Alternatives and Site Selection.

- 2.5.2. With regard to the request for a footpath between the villages of Shepeau Stow and Whaplode Drove, the Order Limits do not extend across these two villages or include the land necessary to provide a connecting route. While a permissive path has been proposed on land within the Order Limits as part of the Scheme design, it is therefore not possible for the Scheme to provide a new public right of way between these two locations. The Applicant will continue discussions with the local highway authority as part of detailed design and will bring this request to its attention.

2.6. Cllr Paul Lock [REP1-123]

- 2.6.1. The Applicant notes Cllr Lock's comment regarding decisions on other solar NSIP schemes and transparency. The Applicant has no comment to make in response.

2.7. David Paul Rains [REP1-124]

- 2.7.1. In response to the points raised by Mr Rains in his submission, the Applicant has provided responses to these issues in the **Relevant Representations Report [REP1-047]**. Specifically:
- The need for the Scheme and climate change policy, see Section 6.27 Planning Policy and Need.
 - Preference for other types of solar development, see Section 6.4 Alternatives and Site Selection.
 - Greenhouse gas emissions during construction, see Section 6.6 Climate Change and Carbon.
 - The status of the Applicant's grid connection offer, see Section 6.16, Grid Connection and OHL.

2.8. Environment Agency [REP1-112]

- 2.8.1. The EA's written representation [REP1-112] provided a summary of the status of engagement on matters raised in the EA's Relevant Representation [RR-047]. The Applicant's responses to the matters raised in the EA's Relevant

Representation [RR-047] were provided within Table 3-5 of the **Relevant Representations Report** [REP1-047] and the **Statement of Common Ground with the Environment Agency** [REP1-083]. The Applicant will continue to engage with the EA to resolve the matters raised.

2.9. Fenland District Council [REP1-102]

- 2.9.1. Applicant's responses to the matters raised by Fenland District Council are provided within Section 2.4 of the **Relevant Representations Report** [REP1-047]. No new matters have been raised by Fenland District Council within their written representation. Further information on Site selection has also been provided within **Post ISH1 Note: Strategic Site Selection** (Doc Ref. 8.35) submitted at Deadline 2.

2.10. Gloria Read [REP1-125]

- 2.10.1. In response to the points raised by Ms Read in her submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Preference for other types of solar development, see Section 6.4 Alternatives and Site Selection.
 - Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land.

2.11. Ian Pennington [REP1-126]

- 2.11.1. In response to the points raised by Mr Pennington in his submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land.
 - The impact of pylons on the countryside, see Section 6.21 Landscape and Visual.
 - Impact of construction traffic on rural roads, see Section 6.31 Traffic and Access.
 - Impact on wildlife, see Section 6.12 Ecology and Biodiversity.

- 2.11.2. The Applicant has responded to Mr and Ms Pennington's concerns regarding landowner engagement in its **Written Summary of Oral Submissions at OFH1** [REP1-097].

2.12. Jane Thompson [REP1-127]

- 2.12.1. In response to the points raised by Ms Thompson in her submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:

- Concerns regarding site selection, see Section 6.4 Alternatives and Site Selection.
- Scale of the development, see Section 6.27 Planning Policy and Need.
- Impact on the countryside and character of the area, Section 6.21 Landscape and Visual.
- Greenhouse gas emissions, including during the construction phase, see Section 6.6 Climate Change and Carbon.
- Disposal of solar panels at the end of operational life, see Section 6.23 Materials and Waste.
- Need for the Scheme and whether it is in the public interest, see Section 6.27 Planning Policy and Need.
- The status of the Applicant's grid connection offer, see Section 6.16, Grid Connection and OHL.

- 2.12.2. Regarding use of the Rochdale Envelope and Holford Rules:

- The Rochdale Envelope involves assessing the maximum (and where relevant, minimum) parameters for the elements of the Scheme where flexibility needs to be retained, recognising that the worst-case parameter for one technical assessment may differ from another. The Applicant has secured these parameters through the **Draft DCO** [REP1-006] and control documentation to ensure these parameters are not exceeded during detailed design.
- Although established in 1959, the Holford Rules remain a current set of planning and design guideline for the routing of new overhead transmission lines, endorsed within the National Policy Statement for Electricity Networks Infrastructure (EN-5). They were reviewed and updated by the industry in the 1990s.

2.13. Jenifer Pennington [REP1-128]

2.13.1. In response to the points raised by Ms Pennington in her submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:

- Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land.
- The impact of pylons on the countryside, see Section 6.21 Landscape and Visual.
- Preference for an underground solution for the Grid Connection Route, see Section 6.21 Landscape and Visual.
- Impact of construction traffic on rural roads, see Section 6.31 Traffic and Access.
- Impact on wildlife, see Section 6.12 Ecology and Biodiversity.
- Concerns regarding air pollution and dust, see Section 6.3 Air Quality.
- Concerns regarding increased noise, see Section 6.24 Noise and Vibration.

2.13.2. The Applicant has responded to Mr and Ms Pennington's concerns regarding landowner engagement in its **Written Summary of Oral Submissions at OFH1** [REP1-097].

2.14. Joanne Blackbird [REP1-129]

2.14.1. The Applicant acknowledges concerns regarding the existing condition and operation of local roads, including the B1166 Hull Drove, B1040 Nene Terrace Road and the A16 corridor. The assessment of the Scheme has been undertaken using observed traffic data and existing highway conditions as the baseline against which the Scheme's effects have been assessed.

2.14.2. The **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] sets out requirements for road condition surveys to be undertaken before, during and following construction on roads directly serving the Scheme and routes used by Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs). Where these surveys identify construction-related effects, appropriate works will be undertaken. The proposed construction traffic routes are shown within **ES Figure 15-3: Heavy Goods Vehicle (HGV) Routing** [APP-161] and **ES Figure**

15-4: Abnormal Indivisible Load (AIL) Routing [APP-162]. The B1040 Nene Terrace Road is not proposed to be used by HGVs or AILs.

- 2.14.3. In addition, the Applicant is in the process of developing a Temporary Passing Place Strategy and will continue to engage with the relevant highway authority regarding access arrangements and any additional mitigation measures considered necessary to facilitate the safe movement of construction traffic whilst minimising effects on local residents, businesses and road users. The Applicant therefore considers that cumulative traffic effects and the suitability of the local road network have been robustly assessed and that appropriate mitigation and management measures have been identified to ensure HGV and AIL movements can be accommodated safely during construction.
- 2.14.4. The Applicant acknowledges concerns regarding the occurrence of collisions on the A16 and B1166 Hull Drove and the condition of the surrounding local highway network. Road safety has been comprehensively assessed as part of the Environmental Statement.
- 2.14.5. The road safety assessment presented in **ES Chapter 15: Traffic and Access** [APP-066], included a review of five years of Personal Injury Collision data and concluded that construction traffic associated with the Scheme would not result in significant road safety effects. This includes on all parts of the A16 and B1166 Hull Drove within the study area which would be used by construction traffic. The conclusion that there will be no significant effects on road safety as a result of the Scheme is based on detailed and robust analysis of Personal Injury Collision (PIC) data presented in **ES Appendix 15-4: Transport Assessment Note (TAN)** [APP-251].
- 2.14.6. With regard to Barrier Bank, the part of the former A1073 which would be used by construction traffic, the Applicant will continue to engage with Lincolnshire County Council regarding its status and any future reopening programme.
- 2.14.7. The **OCTMP** [REP1-067] includes measures for road condition surveys before, during and following construction, together with appropriate remedial works where deterioration is identified as arising from Scheme construction traffic. The Applicant therefore considers that appropriate mechanisms are in place to manage construction traffic effects and to ensure the safe operation of the highway network during the construction phase.

2.15. John Hayes MP [REP1-130]

- 2.15.1. In response to the points raised by Mr Hayes in his submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land and Section 6.27 Planning Policy and Need.
 - The impact of pylons on the countryside, see Section 6.21 Landscape and Visual.
 - Concerns regarding collision risk with overhead lines, see Section 6.26 Ornithology and Birds.
 - Impacts on scheduled monuments, see Section 6.9 Cultural Heritage.
 - Concerns regarding increased noise, see Section 6.24 Noise and Vibration
 - Concerns regarding pre-application consultation, see Section 6.8 Consultation and Engagement.
 - Impacts on the local economy, see Section 6.30 Socio-Economics and Land Use.
 - Request to consider the Scheme as four separate planning applications rather than an NSIP, see Section 6.27 Planning Policy and Need.
- 2.15.2. The Applicant has provided further information regarding the consideration of BMV agricultural land as part of its site selection, in light of current policy, within **Post ISH1 Note: Strategic Site Selection** (Doc Ref. 8.35). The Applicant notes that the Written Ministerial Statement referred to by Mr Hayes 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land (15 May 2024)' no longer represents up to date guidance as per Annex A of the recently updated NPPF.
- 2.15.3. The Applicant also submitted **Post ISH1 Note: Best and Most Versatile (BMV) Land Take** [REP1-099] which provides further details of proposals for soil and land restoration during decommissioning.
- 2.15.4. Further details regarding the siting of the Scheme in areas of higher flood risk are set out in **Post ISH1 Note: Sequential and Exception Tests** (Doc Ref. 8.36).

2.16. Keith Tatnall [REP1-131]

- 2.16.1. The Applicant has addressed concerns that the Scheme is coming forward prematurely due to the Weston Marsh B substation not yet being consented at Section 6.16 of the **Relevant Representations Report** [REP1-047].
- 2.16.2. The method of assessment of soils and agricultural land was presented when the scope of environmental assessment was established. This was agreed through engagement with soils specialists at Natural England. The land and soil investigation was at a standard intensity for surveys, established originally by MAFF and updated in 2025 by Defra (without changes to grading criteria), i.e. one auger point per hectare. The agricultural land survey results are presented within **ES Appendix 5-2: Agricultural Land Classification Report - Parcels A and D** [REP1-028] and **ES Appendix 5-3: Agricultural Land Classification Report - Parcels B and C** [REP1-030]. Cropping data has been provided by landowners of the Solar Development Area and is included within **Appendix A of Applicant's Comments on Local Impact Reports** (Doc Ref. 8.33) submitted at Deadline 2. Cropping is heavily dominated by crops for animal fodder and for bioenergy digestion. There have been relatively small areas grown for peas, potatoes, onions and sugar beet (to a maximum of 80 ha/year) in cropping patterns over a five-year cycle. In recent years, the area allocated into environmental schemes, for example to provide winter bird food, has been greater than the area of vegetable and root crops identified above.
- 2.16.3. Mr Tatnall's concerns regarding EMF impacts of the Scheme are responded to at Section 6.14 Electric and Magnetic Fields of the **Relevant Representations Report** [REP1-047]

2.17. Laura Eldridge [REP1-133]

- 2.17.1. In response to the points raised by Ms Eldridge in her submission, the Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Use of BMV land and concerns regarding food security, see Section 6.2 Agricultural Land and Section 6.27 Planning Policy and Need.
 - Concerns in relation to drainage and flood risk, including matters raised by South Holland Internal Drainage Board, the Environment Agency and Anglian Water, see Applicant's responses to South Holland Internal Drainage Board, the Environment Agency and Anglian Water within Table 3-13, Table 3-5 and Table 3-1 respectively. The Applicant notes

that North Level District Internal Drainage Board has made no submissions to date, but the Applicant is engaging separately with the party to agree protective provisions for inclusion in the Draft DCO.

- Construction traffic and capacity of existing roads to accommodate construction traffic, see Section 6.31 Traffic and Access.
- Concern regarding impact on rural communities, see Section 6 for various environmental topic matters.
- Cumulative effects of multiple energy projects across Lincolnshire, including projects by NGET, see Section 6.10 Cumulative Effects.

2.18. Lincolnshire Against Needless Destruction (LAND) [REP1-132]

- 2.18.1. The Applicant has provided a response to the points raised by LAND at **Appendix A** to this report.

2.19. Lincolnshire County Council [REP1-104]

- 2.19.1. The Applicant has provided a response to the points raised by Lincolnshire County Council which are detailed further in its Local Impact Report. Please see the **Applicant's Response to Local Impact Report** (Doc Ref. 8.33). Lincolnshire County Council's written representation does not contain any new or different points, and therefore its response has not been repeated here.
- 2.19.2. The Applicant has submitted a **Statement of Common Ground with Lincolnshire County Council** [REP1-082] which records the current status of discussions between the two parties. The Statement of Common Ground will be updated throughout the course of the examination to reflect any updates to positions on these matters.

2.20. Mark Humphrey [REP1-134]

- 2.20.1. The Applicant thanks Mr Humphrey for his support towards the Scheme.

2.21. Meridian Action Group (MAG) [REP1-135]

- 2.21.1. The Applicant has provided a response to the points raised by Meridian Action Group at **Appendix A** to this report.

2.22. National Grid Electricity Transmission [REP1-113]

- 2.22.1. The written representation from NGET raises five key concerns responded to below. The **Statement of Common Ground with NGET** [REP1-089] was submitted at Deadline 1 and records the current status of discussions between the two parties.

Connection Agreement

- 2.22.2. The Applicant most recently provided an update to the status of its grid connection in its **Written Summary of Oral Submissions at ISH1** [REP1-098] and within the **Connection to the National Grid Weston Marsh Substation Note** [REP1-094]. However, to provide clarity on concerns raised in NGET's written representation, the Applicant provides the following comments.

Location of connection in Gate 1 offer

- 2.22.3. The statement by NGET at 3.2 of its Written Representation that in November 2025 the Applicant's connection agreement was "*replaced by a Gate 1 offer with no identified location for connection or confirmed date for connection*" is incorrect. The Applicant's Gate 1 offer specifically identifies its intended point of connection would be at "Weston Marsh".

NESO Direction on engagement with Gate 1 projects

- 2.22.4. It is the Applicant's understanding that NGET's position to stop progressing transmission works for projects with Gate 1 offers arises from NESO's Gate 1 Advice. That advice specifically provides:¹

"If you receive a Gate 1 notification, the relevant Transmission Owner for your 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). This applies to all Gate 1 projects and reflects the requirements of the reformed connections process."

- 2.22.5. The Applicant acknowledges the above direction is a pragmatic approach taken by NESO to ensure design and delivery resource within Transmission Owners is first directed to those projects with confirmed connection agreements. The

¹ NESO, Gate 1 Information <https://www.neso.energy/industry-information/connections-reform/gate-1-information>

Applicant understands it directs the pause of transmission projects allocated **for the sole benefit of** a Gate 1 project – e.g. a dedicated new substation or bay within an existing substation that would not be required if the Gate 1 project was not proceeding. The Applicant does not understand it to:

- Require the pause of wider transmission projects which serve more than just Gate 1 projects, but may establish their need in part through Gate 1 projects. This is evidenced by the acknowledgment regarding substation allocation within the quote above. It is also evidenced by the continued progression of Grimsby to Walpole (G2W) by NGET, which relies in part on Meridian Solar to form its needs case within the Weston Marsh region (see discussion regarding the G2W planning application within the Applicant's **Written Summary of Oral Submissions at ISH1** [REP1-098]).
- Require NGET to refuse any engagement with Gate 1 projects. The Applicant understands that NGET cannot confirm design or capacity for the Scheme at its substations at this stage. However, the Applicant does not consider it appropriate for NGET to use the above direction to refuse any engagement on matters of cumulative effects or potential design interactions, while claiming the Scheme should be refused on such basis. This would enforce a defacto "trumping" of the design of NGET projects over all other energy transition projects, with no obligation on NGET to coordinate its works or reduce potential cumulative effects on an area. There has been no direction from NESO which supports such an approach. The Applicant considers it directly conflicts with paragraph 2.8.34 of EN-5 which NGET cites in its Written Representation, namely for the co-ordination of energy projects. Further, it undermines the broader goals as set out in government policy for the efficient development of renewable energy projects in order to achieve net zero.

Allocation at Weston Marsh Substation B

- 2.22.6. The Applicant acknowledges the clarification from NGET that prior to the Connections Reform process, NGET had allocated Meridian Solar a bay at Weston Marsh Substation A. However, the Applicant clarifies that it has never received a formal confirmation by NGET as to an allocation at Substation A.
- 2.22.7. While NGET had indicated in late 2025 that its (then current) designs anticipated a connection a Substation A, it was acknowledged by NGET to Meridian Solar that this was subject to the ongoing design of G2W, and may therefore be subject to change. In fact, engagement with NGET in 2025 indicated that a connection at Substation B could be progressed through a Mod-App process to

enable them to undertake further technical studies and design work to accommodate a connection at that location.

- 2.22.8. Further, the targeted consultation materials released by NGET on G2W in November set out that Substation B “*would also provide future connection points for solar, battery storage, and other energy generation projects, supporting onward transmission to Walpole and East Leicestershire.*”² This suggested to the Applicant that there was the potential for capacity at Substation B for new connection points by energy projects.
- 2.22.9. As such, the Applicant did not consider this information certain enough to change its grid connection route design at that time. It is the Applicant’s position that a connection to Substation B remains the most appropriate for both projects, where it would reduce the Scheme’s grid connection by up to approximately 4km, and therefore reduce the cumulative impact of both these projects on the surrounding area. NGET has not outlined in its Written Representation any “*obvious reason why a network connection would not be possible*” at Substation B, which is the relevant test where a network connection agreement remains outstanding, per paragraph 4.11.6 of NPS EN-1. The Applicant acknowledges that should a Gate 2 Connection offer confirm the Scheme connection is at Substation A instead, it would be required to obtain either a variation to its DCO, or further consents to deliver the remaining up to approximately 4km (estimated length based on assumed paralleling with the G2W RJ proposed OHL).

Physical Interfaces and Proximity

- 2.22.10. Section 4 of NGET’s Written Representation outlines its concern that it is not possible to coordinate design of the Scheme, G2W, such that both the Scheme and G2W can be delivered safely. This concern is outlined predominantly in respect of achieving appropriate stand-off distances between the projects, and specifically those that NGET states are outlined within National Grid’s Technical Specification Generic Design Principles for Overhead Lines TS2.04 Issue 6 (2021) (“**Technical Specification TS2.04**”).
- 2.22.11. NGET state within the Written Representation, that as set out in Technical Specification TS2.04, a 55.5m tall tower would result in a requirement for a 92.5m stand-off distance, on the basis of minimum standoff distance being “no

² See Grimsby to Walpole 2025 Targeted Consultation Document
<https://www.nationalgrid.com/document/565471/download>

less than the height of the tallest tower in that section multiplied by 1.1 times (tower falling distance plus 10%)."

- 2.22.12. Through an online search, a copy of the NGET TS2.04 specification was obtained to help verify this information³. In this document there is no reference to, or mention of parallel overhead lines, stand-off distances, tower falling distances or separation distances, nor is there any mention of pylons heights or multiplication factors and how these drive separation distances between overhead lines. Other industry standards and technical documents including 'Energy Network Association (2019), ENA TS 43-8 Overhead Line Clearances Issue 5', also make no reference to separation and/or paralleling of overhead lines.
- 2.22.13. As such, from the Applicant's review of these technical specifications it is not clear where the information regarding overhead line stand-off distances that is stated in NGET's Written Representation to be contained within Technical Specification 2.04 is derived from. The Applicant would appreciate further clarity on the above values and stand-off distances, alongside confirmation where in the technical specifications this is detailed.
- 2.22.14. However, to try to address NGET's concerns, the Applicant has applied the stated 1.1 multiplier to the tower heights specified by the Scheme. Applying this multiplication factor of 1.1 to a pylon 55.5m in height (as used for reference by NGET) would result in a minimum separation distance of 61.05m. By comparison, the Scheme has a maximum pylon height of 66m. Applying the 1.1 multiplication factor to this, as stated by NGET, results in minimum separation distance of 72.6m. In summary, it is not clear how NGET has arrived at the conclusion that a minimum of 92.25m separation distance would be required, given this is well in exceedance of the tower falling distance plus 10%.
- 2.22.15. NGET's written representation raises concerns more broadly that overhead lines operating in close parallel would pose an unacceptable risk to NGET's ability to maintain and operate its assets in a safe manner.
- 2.22.16. However, as set out in Table 3.9 of the **Relevant Representations Report** [REP1-074], the Applicant has had regard to the many 400kV transmission lines across the UK which have been constructed, are currently maintained and operate in

³ <https://www.scribd.com/document/831291880/TS-2-04-6-Generic-Deisng-Principals-for-OHL-s>

close parallel at varying separation distances. A few examples of existing 400kV OHLs in parallel (centreline to centreline) are provided below:

- The YYJ and ZB OHLs near Tilbury route in ~40m close parallel. This narrows in places near Orsett Golf Course down to ~36m. On the approach to Tilbury Substation, the two OHL's are ~46m in parallel, with a UKPN 132kV crossing beneath the NGET assets, as well as encircling both NGET assets, (~21m to the east adjacent to a railway line and 26m to the west).
- The ZJ 400kV OHL on the approach to Tilbury Substation is ~23m apart from the UKPN 132kV PEA overhead line, as well as operating in a diamond duck-under configuration.
- The 4TM and ZDA OHLs south of Keadby route in ~65m close parallel. It is further noted that the 4TM 200kV OHL has successfully recently undertaken conductor refurbishment works, despite its close proximity to the ZDA line.
- The ZDF and ZDA OHLs south of High Marnham route in ~60m close parallel.
- The 4KG and 2KN OHL's south of Barton-Upon-Humber route in ~70m close parallel.
- The 2AC and 2AD OHL's west of Killingholme route in 50 ~50m close parallel.

2.22.17. In addition to this, various National Grid publicly available documents contradict NGET's stated close parallel distance of "92.25 metres". For example, at Section 4.2.4 of the Norwich to Tilbury 'Corridor and Preliminary Routeing and Siting Study (CPRSS) 2022', National Grid have stipulated that the *"The minimum distance between close-parallel lines is defined by technical and safety constraints and would typically be 80m (noting that the lines between Sizewell and Bramford are only 50m apart at many points with the closer positioning possible because they were constructed at the same time). As per Section 5.8.3 of the North Humber to High Marnham 'Corridor Preliminary Routeing and Siting Study (CPRSS) 2023), National Grid state that "The minimum distance between lines is determined by technical and safety constraints and would typically be 80m".*

2.22.18. Whilst National Grid advise that their understanding of the preferred, minimum stand-off is marginally reduced, NGET have not presented any technical evidence as to why this would impede NGET's ability to maintain its assets in a safe manner, in this specific location. Instead, NGET's concerns outlined at 4.12

relate to concerns regarding deliverability and coordination between it and a third party like the Applicant. Those concerns are responded to in the next section in respect of the management of such coordination through protective provisions.

Application of standards to scheme interactions

2.22.19. In respect of the Applicant's review of the areas of interaction identified between the Scheme Order limits and G2W's indicative boundary, the Applicant's current assessment indicates that both G2W and the Scheme can co-exist.

- Between Long Lane and High Road, both 400kV OHLs can co-exist in close parallel with a stand-off of 85m from centreline to centreline.
- It is considered that the only location where close paralleling needs to reduce to 75m is north of High Road (A151) to respond to site specific constraints, specifically the where the Anglian Water pipelines and treatment works site to the east, and the Wool Hall Farm complex to the west of Lord's Drain.

2.22.20. In this area, if both schemes commit to a reduced centreline to centreline parallel distance of 75m then both OHLs could be routed through the pinch points to keep all infrastructure together on the approach to Weston Marsh B substation and avoid encircling farms and scattered properties in the area. The Applicant therefore considers there remains a credible design solution capable of accommodating both projects through this area. The Applicant considers this can be achieved for both projects in a way which does not interfere with their safety or efficiency, provided both parties continue to engage and coordinate their final detailed design.

Existing Infrastructure

2.22.21. The Applicant acknowledges the Existing NGET Infrastructure within and/or in close proximity to the Order Limits of the Scheme. The Applicant has included at Schedule 13, Part 7 of the **Draft Development Consent Order** [REP1-006] protective provisions for the benefit of NGET. These reflect the Applicant's preferred terms of NGET's standard protective provisions, which remain in negotiation between the parties.

2.22.22. However, in response to the matters raised in section 5 of NGET's Written Representation, the provisions provide a comprehensive framework for the protection of NGET's apparatus and interests, including provisions relating to retained and alternative apparatus, access, approval of specified works,

protective works, costs and indemnity. The Applicant can specifically confirm these include:

- At paragraph 71, protection for existing NGET infrastructure, whereby the Applicant must seek the approval of NGET for the design and construction of any works within 15m of NGET apparatus (addressing the concern raised in NGET WR at 5.3).
- At paragraph 66, protection NGET's ongoing access at all times to inspect, maintain, renew and repair its existing apparatus (addressing the concern raised in NGET WR at 5.4).
- At paragraph 68, restriction on the undertaker from appropriating or acquiring any land or apparatus held by NGET other than by agreement (addressing the concern raised in NGET WR at 5.5-5.7).

2.22.23. The Applicant notes that despite Section 5 of NGET's being titled "Existing Infrastructure" it also includes reference to protections sought by NGET in respect of proposed infrastructure. The following sections address these matters.

Protection of future NGET Assets

2.22.24. NGET's Written Representation further outlines comments regarding management of the interfaces between the Scheme, G2W and WMEL (together, the "**Proposed NGET Projects**") via protective provisions. At paragraph 6.9 of NGET's Written Representation, it has proposed drafting to manage these interfaces.

2.22.25. The Applicant's preferred drafting of the protective provisions as included at Schedule 13, Part 7 of the Draft Development Consent Order [REP1-006], has made amendments to the NGET drafting. For ease of reference, a tracked change version of the against that set out at 6.9 of NGET's Written Representation is provided at **Appendix B** to this document.

2.22.26. Specifically, the Applicant's amendments ensure the obligations to cooperate are balanced between the parties. The efficient parallel design and coordinated construction of the Scheme and the Proposed NGET Projects will require both parties to engage and share relevant design and programming information. The Applicant does not consider that this can be achieved effectively through obligations imposed solely on the undertaker.

2.22.27. NGET has referred to the protective provisions included in the Awel y Môr and Mona Offshore Wind Farm DCOs as precedent for protective provision drafting relating to the protection of future NGET projects. The Applicant has reviewed

those provisions and the context in which they were developed. Both projects proposed to connect into the existing Bodelwyddan substation in North Wales, with the relevant future NGET works comprising potential upgrades and extensions to that existing asset. In both cases, the protective provisions were developed in the context of future works associated with an existing operational substation whose location was already established.

- 2.22.28. Although the detailed design, programme and land requirements for those future works may not have been established, the location of the receiving substation was already fixed and known. The relevant interface was therefore anchored to an existing NGET asset at an established location. The coordination required in those cases was principally directed towards ensuring that the generating station connection works did not prejudice potential future works associated with that existing asset.
- 2.22.29. The circumstances of the Scheme are materially different. The Scheme is proposed to connect into new NGET infrastructure being progressed through a separate design and consenting process. The Proposed NGET Projects including the proposed Weston Marsh substation, remain at the pre-application stage. The final siting, design and programme for that infrastructure therefore remain subject to ongoing development by NGET. This creates a greater need for continuing engagement and information sharing by both parties as their respective designs, programmes and land requirements develop.
- 2.22.30. The Applicant considers that the Springwell Solar Farm DCO provides a more relevant precedent in these circumstances. Springwell was also dependent upon a proposed new NGET substation that did not benefit from planning permission and was being progressed separately by NGET. The Springwell Examining Authority expressly acknowledged the uncertainty arising from the stage reached by the separate planning application for that substation. The Springwell protective provisions accordingly included reciprocal coordination obligations on both the undertaker and NGET, including obligations to provide points of contact, share relevant design information and facilitate a coordinated approach to the delivery of their respective works. The Applicant considers that this reflects the practical reality that effective coordination between a generating station and proposed future NGET infrastructure depends upon engagement and information sharing by both parties, rather than obligations operating solely in one direction.
- 2.22.31. The Applicant therefore considers that its preferred protective provisions provide an appropriate framework for protecting NGET's interests and facilitating coordination between the Scheme and the Proposed NGET Projects.

The Applicant will continue to engage with NGET during the examination with a view to seeking to agree the protective protections.

Restriction on Compulsory Acquisition Powers

- 2.22.32. The Applicant notes NGET's comments regarding the exercise of compulsory acquisition powers in respect of its land, rights and apparatus.
- 2.22.33. As noted above, the Applicant's preferred protective provisions included in the **Draft DCO** [REP1-006] submitted at Deadline 1 already provide at paragraph 68 that, notwithstanding the other provisions in the Order, the Applicant may not appropriate, acquire or take temporary possession of NGET land or apparatus, or appropriate, acquire, extinguish, interfere with or override any easement, other interest or right and/or apparatus of NGET, otherwise than by agreement.
- 2.22.34. The Applicant does not, however, consider it appropriate for this restriction to extend to land or rights which NGET does not currently own or hold but may seek to acquire in the future for the Proposed NGET Projects. Section 127 of the Planning Act 2008 only provides protection in respect of existing land and rights held by statutory undertakers. The Applicant does not consider that this protection should be extended through the protective provisions to restrict the exercise of the Applicant's compulsory acquisition powers over land in which NGET does not currently have a legal interest.
- 2.22.35. In particular, the Proposed NGET Projects are not yet at a stage where their final land requirements have been established through a DCO or compulsory purchase process. The final routes, and therefore Order limits subject to such requirements, remain subject to further change. Extending the restriction to potential future interests would therefore create uncertainty as to the land over which the Applicant could exercise its powers and would unreasonably constrain the Applicant in progressing the land arrangements required for the Scheme. Should NGET require additional land or rights for the Proposed NGET Projects in due course, those interests may be sought through the relevant consenting and land acquisition processes or by voluntary agreement with the relevant landowners and rights holders.
- 2.22.36. The Applicant also notes that, in the Awel y Môr Offshore Wind Farm DCO examination, the Examining Authority concluded that section 127 of the Planning Act 2008 was not engaged in respect of NGET for the area of the potential future substation extension because it was not identified as a landowner. The Examining Authority was satisfied in that instance that the compulsory acquisition powers sought by the Offshore Wind Farm over the area

for the potential substation extension were necessary and would not result in serious detriment to NGET's undertaking. The Applicant considers that this is consistent with the distinction it has made in the protective provisions included at **Schedule 13, Part 7 of the Draft Development Consent Order [REP1-006]** between existing proprietary interests and protection of potential future land requirements which have not yet been secured.

- 2.22.37. This does not preclude appropriate coordination between the projects. As explained above, the Applicant's preferred protective provisions include specific mechanisms for ongoing liaison, consultation on detailed design and programming, and coordination in relation to construction programming and land assembly.
- 2.22.38. The Applicant therefore considers that its preferred protective provisions appropriately address NGET's concerns regarding the exercise of compulsory acquisition powers while maintaining an appropriate distinction between NGET's existing legally protected interests and potential future land requirements for the Proposed NGET Projects. The Applicant will continue to engage with NGET with a view to seeking to agree the protective provisions during the Examination.

2.23. National Highways [REP1-115]

- 2.23.1. The Applicant agrees with National Highways that the majority of matters have been resolved and that an outstanding query around potential impact of construction traffic at the A47/A16 junction remains. The Applicant has provided the requested information to National Highways and is currently waiting for a response from National Highways on whether the information provided closes out the query raised. The Applicant will continue to engage with the National Highways to resolve the outstanding query and will update and resubmit the **Statement of Common Ground with National Highways [REP1-086]** once this last query has been resolved.

2.24. Natural England [REP1-116 and REP1-117]

- 2.24.1. The Applicant notes Natural England's comments in its Written Representation [REP1-116 and REP1-117]. These provide a summary of the matters raised in Natural England's Relevant Representation [RR-140]. The Applicant's responses to these matters have been provided within Table 3-11 of the **Relevant Representations Report [REP1-047]** and the **Statement of Common Ground**

with Natural England [REP1-084]. The Applicant will continue to engage with Natural England to resolve the matters raised.

2.25. Network Rail Infrastructure Limited [REP1-118]

- 2.25.1. The Applicant's notes Network Rail's written representation and its continued request for bespoke protective provisions, including restrictions on the exercise of compulsory acquisition and other powers affecting railway property and a requirement for an asset protection agreement.
- 2.25.2. As set out in Table 3-12 of the **Relevant Representation Report** [REP1-074], the Applicant is engaging with Network Rail regarding the nature and extent of its interests within the Order Limits, the relationship of those interests to Network Rail's statutory undertaking, and the protections that may be appropriate. In particular, the Applicant continues to seek clarity regarding the nature and current relevance of Network Rail's historic interests and reserved rights over areas of former or disused railway land. The Applicant sought further clarification from Network Rail's solicitors on 21 July 2026 and followed up on 29 July, 4 August, 14 August, 2 September, and 1 October 2026. Although Network Rail's solicitors responded on 30 July 2026, the Applicant has not yet received a substantive response addressing the specific interests, assets or operational concerns affected by the Scheme or the protections considered necessary.
- 2.25.3. The Applicant does not agree with Network Rail's assertion that the requirements of section 127 of the Planning Act 2008 cannot be satisfied unless paragraph 4 of Network Rail's standard protective provisions is included in the DCO. Nor does the Applicant accept that the exercise of the powers sought would necessarily cause detriment to Network Rail's undertaking. These matters fall to be considered by reference to the nature of the particular interests affected and the effects of the powers sought, taking account of any protections ultimately agreed between the parties.
- 2.25.4. The Applicant notes that Network Rail is continuing to review the application of section 138 of the Planning Act 2008 and has reserved its position in that respect. The Applicant will continue to engage constructively with Network Rail regarding its land interests, rights and operational requirements, including the form of any bespoke protective provisions and any associated asset protection or property agreements that may be appropriate.

2.26. Nicola Singh [REP1-136]

- 2.26.1. The Applicant has provided a response to the points raised by Ms Singh in her written representation below.
- 2.26.2. With regards to the comments raised on employment impacts, **ES Chapter 14: Socio-Economics and Land Use** [APP-065] sets out the Applicant's estimate of the net employment impacts of the Scheme. It is recognised that some roles are likely to be filled by workers outside the local area; an assumption of 60% leakage of economic benefits outside of the 60-minute drive time area is applied within the assessment in recognition of this. During the construction phase, it is thus estimated that 207 FTE jobs would be created by the Scheme, of which 83 would be taken up by people living within the study area (a 60 minute drive time).
- 2.26.3. An estimated 11 FTE jobs would be provided during the operational phase of the Scheme, of which 5 FTE jobs are expected to be taken up by local people. These job estimates include indirect jobs which in part relate to spending by workers in local shops and on local services. The **Outline Skills, Supply Chain and Employment Plan** [REP1-072] provides a framework for maximising opportunities for the local supply chain and upskilling local residents. The approaches described have potential to increase the uptake of job opportunities by local people. Commitments to securing these local benefits will be laid out within the detailed Skills, Supply Chain, and Employment Plan, which must be prepared and approved prior to commencement and subsequently implemented as approved in accordance with Requirement 20 (Skills, Supply Chain and Employment) of the **Draft DCO** [REP1-006].
- 2.26.4. With regards to impacts on residents, **ES Chapter 10: Human Health** [APP-061] assesses the effects of the Scheme on physical and mental health, including as a result of changes to air quality, landscape and visual amenity, noise and vibration and traffic and access. It acknowledges that environmental disruption and changes to the landscape could adversely impact mental well-being, while also noting that the Scheme is unlikely to affect social infrastructure or social connections, and that there would be benefits associated with employment generated by the Scheme. Overall, a minor adverse effect on mental health is anticipated during the construction phase, the operational phase and the decommissioning phase. This conclusion reflects that measures will be put in place to mitigate disruption during construction phase, as set out in the **Outline Construction Environmental Management Plan (OCEMP)** [REP1-061], and that landscape and visual impacts will be mitigated by design measures such as set-

backs from residential receptors, planting and screening, as set out in the **Outline Landscape and Ecology Management Plan (OLEMP)** [REP1-070]. Section 4.2 of the **OLEMP** [REP1-070] describes the landscape design principles which underpin the Scheme design and secures measures to minimise impact on the visual amenity of residential properties adjacent to the Solar Development Area.

- 2.26.5. For instance, in accordance with Section 4.2 of the **OLEMP** [REP1-070] and as shown on **Works Plans - Section A Solar Development Area** [APP-009] sheet 9/10 and Annex A of the **OLEMP** [REP1-070], Habitat Management Area 7 (Work No. 7) will be provided as a buffer between residential properties and the solar panels along Langary Gate Road. This HMA 7 creates an offset to the panels of a minimum of 50m. This HMA 7 will also include advanced planting consisting of bands of shrubs and scattered trees along sections of the PV Panels west of Langary Gate Road, so that the planting will be established by the time the panels are installed. On the western side of Langary Gate Road, there is another offset from properties to the panels, within which species rich grassland will be planted and a scattered band of shrubs and trees will be planted at the edge of the solar panels.
- 2.26.6. With regards to noise impacts, noise modelling was undertaken in accordance with the industry-standard methodology set out in ISO 9613. The methodology accounts for the effects of topography, ground conditions and screening by buildings and other features on sound propagation. Topography and buildings were incorporated into the three-dimensional noise model using Ordnance Survey mapping data, ensuring that local landform and built features were taken into account in the prediction of noise levels. Further details of the noise modelling methodology and assumptions are provided in **ES Appendix 13-3: Construction and Operational Noise Modelling** [APP-064].
- 2.26.7. To account for acoustic features of operational noise, a +3 dB acoustic character correction was applied to the operational plant – in accordance with BS 4142 – to account for the sound having the potential to be distinctive against the residual acoustic environment (i.e. the steady hum present from cooling fans). This represents a precautionary assessment approach when determining the potential impact of operational noise.
- 2.26.8. The operational noise assessment was undertaken in accordance with relevant national policy and guidance. The assessment concluded that no significant effects on health or quality of life are predicted as a result of operational noise from the Scheme. Further information on the conclusions of the operational

noise assessment is provided in Table 6-24 within the **Relevant Representation Report** [REP1-074].

- 2.26.9. With regards to construction, an indicative construction programme is provided within **ES Chapter 2: The Scheme** [AS-017]. The construction of the Scheme will take up to 4 years. A detailed construction programme will be provided at detailed design. Construction-phase controls are secured through Requirement 12 (Construction Environmental Management Plan) of the **Draft DCO** [REP1-006]. The Construction Environmental Management Plan must be substantially in accordance with the **OCEMP** [REP1-061] and approved by the relevant planning authority prior to commencement of the relevant part of the authorised development. The Applicant has also developed an **OCTMP** [REP1-067] which includes a range of measures to manage construction traffic and maintain highway safety throughout the construction phase.
- 2.26.10. With regards to carbon footprint of imported materials, the greenhouse gas (GHG) assessment within **ES Chapter 7: Climate Change** [APP-058] has assumed as a worst-case scenario that all solar PV panels and BESS components will be manufactured in China. This is stated within the assumptions and limitations section of **ES Chapter 7: Climate Change** [APP-058]. GHG emissions resulting from the manufacture and transport of these components to Site have been considered within the assessment.
- 2.26.11. In response to the other comments made by Ms Singh in her submission, the Applicant has provided responses to these issues in various documents submitted into examination. Specifically:
 - Use of Best and Most Versatile (BMV) land, see Section 6.2 Agricultural Land of the **Relevant Representations Report** [REP1-047].
 - Cumulative effects of multiple energy projects across Lincolnshire, including projects by NGET, see Section 6.10 Cumulative Effects of the **Relevant Representations Report** [REP1-047].
 - The status of the Applicant's grid connection offer, see Section 6.16, Grid Connection and OHL of the **Relevant Representations Report** [REP1-047].
 - Concerns with regards to landscape and visual effects, see Section 6.21 of the **Relevant Representations Report** [REP1-047].
 - Construction traffic and capacity of existing roads to accommodate construction traffic, see Section 6.31 Traffic and Access of the **Relevant Representations Report** [REP1-047].

- Assessment of fish, see Section 3.5 of the **Relevant Representations Report** [REP1-047], comments EA24 to EA30.
- Further clarification on the reinstatement of agricultural land was submitted at Deadline 1 within **Post ISH1 Note Best and Most Versatile (BMV) Land Take** [REP1-099].
- Further information on Site selection and flood risk has been submitted at Deadline 2 within **Post ISH1 Note: Strategic Site Selection** (Doc Ref. 8.35) and **Post ISH1 Note: Sequential and Exception Tests** (Doc Ref. 8.36).

2.27. Stuart Winterton [REP1-138]

- 2.27.1. Other than a concern with regards to the impact of overhead line infrastructure on birds, the comments submitted within the written representation from Mr Winterton are the same as the comments set out above by Ms Singh. Responses to these comments are provided above and are not repeated here.
- 2.27.2. With regards to comments raised with regards to the impact on birds, the Applicant has provided a response to this within Section 6.26 of the **Relevant Representation Report** [REP1-074] submitted at Deadline 1. The Applicant also notes that Natural England is largely in agreement with the Applicant's assessment of impacts on birds, as recorded within the **Statement of Common Ground with Natural England** [REP1-084] (see NE18).

2.28. Tim Henderson [REP1-139]

- 2.28.1. The assessment of GHG emissions presented within **ES Chapter 7: Climate Change** [APP-058] related to the Scheme is considered to be undertaken in line with best practice and ISEP guidance on assessing GHG emissions. The Applicant acknowledges that payback of CO₂ emitted during construction will be paid back within four years. Emissions relating to the replacement of solar panels will not occur at the time of construction, meaning the Scheme will never operate at a significant net positive emissions rate beyond the first few years of operation. When compared to the current UK grid carbon intensity, the Scheme is anticipated to produce 87% lower carbon energy. This will reduce national emissions approximately 118,000 tCO_{2e} in the first year of operation. Projected into the future, the entire whole life carbon emissions will be offset after 10 years of the 40 year design life. This will result in 30 years of net emissions savings compared to the current grid mix.

- 2.28.2. In addition to this, a conservative assumption has been made that no decarbonisation of manufacturing or transport processes will occur over the lifetime of the Scheme. In reality, the carbon footprint of replacement components will likely result in reduced emissions when compared to the initial construction.
- 2.28.3. CO₂e emissions relating to the BESS are considered to be a conservative worst-case scenario assessment in line with best practice and ISEP guidance, including a 10-year replacement cycle. Additionally, energy benefits associated with the BESS have not been considered within the assessment due to uncertainty which has resulted in an underestimation of the energy the Scheme will deliver to the UK grid.
- 2.28.4. This assessment has also assumed as a worst-case that all Solar PV Panels and BESS systems will be manufactured in East Asia, considering local Environmental Product Declarations (EPDs) and associated transport emissions.

2.29. Tracey Buckley [REP1-140]

- 2.29.1. In response to the points raised by Ms Buckley in her submission, Applicant has provided responses to these issues in the **Relevant Representations Report** [REP1-047]. Specifically:
- Concerns regarding air pollution and dust, see Section 6.3 Air Quality.
 - Cumulative effects of multiple energy projects across Lincolnshire, including projects by NGET, see Section 6.10 Cumulative Effects.
 - Concerns regarding increased noise, see Section 6.24 Noise and Vibration.
 - Impact of construction traffic on rural roads, see Section 6.31 Traffic and Access.

2.30. Water Management Alliance [REP1-119]

- 2.30.1. The Applicant notes the Water Management Alliance's comments in its Written Representation and has no further comments to make in addition to those in Section 3.13 of the **Relevant Representations Report** [REP1-047] and the **Statement of Common Ground with Water Management Alliance** [REP1-087].

Appendix A: Applicant's Responses to LAND and MAG Written Representations

Lincolnshire Against Needless Destruction (LAND) [REP1-132]

The following points have been responded to within Section 5-5 of the **Relevant Representations Report** [REP1-074] submitted at Deadline 1:

- Comments regarding consultation and community engagement.
- Comments regarding grid connection and cumulative effects assessment.

New queries raised in the Lincolnshire Against Needless Destruction Written Representation are addressed in the table below.

Table 2-1 Responses to new queries raised in the Lincolnshire Against Needless Destruction Written Representation

Reference	Topic	Summary of Matter Raised	Applicant's Response
1.1	Cumulative agricultural land use	LAND query how figures quoted by the Applicant with regards to cumulative agricultural land use at the Open Floor Hearing 1 have been derived.	Applicant's cumulative assessment of agricultural land take of solar schemes within the administrative area of Lincolnshire County Council is provided within Section 5.11 of ES Chapter 5: Agriculture and Soils [REP1-014]. Table 5-18 provides the agricultural land use for solar NSIP and Town and Country Planning Act 1990 applications in Lincolnshire, as reported by each of these applications.
1.2	Temporary use and restoration	Query to clarify whether agricultural land would be restored to its original agricultural land classification grade upon restoration, how that would be secured, and the implications for productivity if restoration is not possible.	The Applicant submitted Post ISH1 Note: Best and Most Versatile (BMV) Land Take [REP1-099] document to provide additional clarity on techniques and timeframes for restoration. Restoration is secured through the Outline Soil Management Plan (OSMP) [REP1-068].
1.3	Temporary use and Restoration	Continued or possible sheep grazing is not equivalent to maintaining the productive arable farming displaced.	The Applicant has not claimed that sheep grazing would be equivalent to arable farming, however, has noted that it is considered as a suitable land management option during the operational phase

Reference	Topic	Summary of Matter Raised	Applicant's Response
			within the Outline Landscape and Ecology Management Plan (OLEMP) [REP1-070] and ES Chapter 5: Agriculture and Soils [REP1-014].
1.4	Sheep grazing and animal welfare	LAND requests that the Applicant provide a site-specific grazing strategy.	It is not possible for the Applicant at this stage to produce a detailed site-specific grazing strategy, as it is too early for the Scheme to enter into contractual arrangements with graziers. Hence the requested information is premature. However, the feasibility of sheep grazing at solar farms within the UK can be evidenced from BRE (2014) Agricultural Good Practice Guidance for Solar Farms ⁴ . The OLEMP [REP1-070] and ES Chapter 5: Agriculture and Soils [REP1-014] refer to sheep grazing as an option for operational land management, however, the assessment of effects reported within the ES is not reliant on this option as a mitigation.
1.5	Sheep grazing and animal welfare	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	Table 5-13 of ES Chapter 5: Agriculture and Soils [REP1-014] sets out that over 430ha of the Solar Development Area would be managed as grassland. Sheep grazing would be an option for land management in the areas, where grassland is proposed. It is further noted that 180ha is also to be retained in

⁴ BRE (2014) Agricultural Good Practice Guidance for Solar Farms. Ed J Scurlock. Available at: https://files.bregroup.com/solar/NSC_-_Guid_Agricultural-good-practice-for-SFs_0914.pdf [Accessed 02/10/2026]

Reference	Topic	Summary of Matter Raised	Applicant's Response
		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.	agricultural use (e.g. comprising Habitat Management Areas to remain in arable use with enhanced measures for ground nesting farmland birds). Areas of grassland and to be retained in agricultural use are set out and secured through the OLEMP [REP1-070].
1.6	Employment	Further clarification requested on how net employment gain has been calculated. 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;	The calculation of 11 net additional operational jobs is set out in Table 14-23 of ES Chapter 14: Socio-Economics and Land Use [APP-065], applying the additionality assumptions and their justification set out in Table 14-4. Of the 10 gross direct operational jobs, a leakage factor of 60% (the proportion of jobs expected to be taken by people living outside the 60-minute study area) results in 4 gross jobs within the study area and 6 outside it. A displacement factor of 25% is then applied, giving net direct employment of 7 (3 within the study area, 4 outside). A composite multiplier of 1.5, reflecting indirect and induced employment through the supply chain and local spending, is applied to net direct employment, giving indirect and induced employment of 4 (2 within the study area, 2 outside). This results in total net employment of 11 (5 within the study area, 6 outside). These leakage, displacement and multiplier assumptions, and their justification, are drawn from the HCA Additionality Guide. This is a best practice approach and tests whether the jobs generated are additional, rather transferred from

Reference	Topic	Summary of Matter Raised	Applicant's Response
		• 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.	elsewhere or already existing in the study area. Paragraph 14.8.53 describes the 10 gross jobs as permanent, being long-term jobs generated once the Scheme is operational. ES Chapter 14: Socio-Economics and Land Use [APP-065] assesses existing agricultural employment on the Site as zero, as set out in Table 14-23. This reflects that there are five landowners within the Solar Development Area and no tenant farmers, and that any contractors undertaking farming activities on the land are not considered to be wholly reliant on it for employment. Within the Grid Connection Route there are 42 landowners and three tenant farmers, and within the Inter-Array Connections there are 14 landowners and two tenant farmers; the Applicant's assessment is that disruption to farming activities in these areas would be temporary and short-term, so no operational loss of employment is expected. This assessment of existing employment is based on the Applicant's understanding of how the land is farmed and professional judgement, rather than a business-by-business employment survey, which the Applicant does not consider proportionate to undertake. A more detailed assessment of indirect employment in agricultural machinery, haulage, agronomy and other agricultural supply chain businesses would not be

Reference	Topic	Summary of Matter Raised	Applicant's Response
			proportionate. The undertaking of sensitivity tests is similarly not considered proportionate. Given the conclusion that no material loss of agricultural employment is anticipated, and that the majority of affected landowners within the Grid Connection Route and Inter-Array Connections would not experience any substantial change to their farming activities, it is considered reasonable to conclude that the Scheme would not have a significant effect on the wider agricultural supply chain.
1.7	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	The Applicant intends to reapply for Gate 2 status at future application rounds as NESO confirms the availability of further regional capacity, particularly as major network upgrades, including the Grimsby to Walpole reinforcement, progress. There is no evident barrier to Meridian Solar Farm being granted a Gate 2 offer in future rounds. Such offer would provide greater detail of the connection requirements. In the absence of any confirmed specification by NESO, or any indication from NGET at this stage that the parameters being provided for under the Grimsby to Walpole grid connection infrastructure have changed, the Applicant is progressing the application and design in accordance with the general terms of the original grid connection

Reference	Topic	Summary of Matter Raised	Applicant's Response
		assessment of effects and benefits assumes connection in 2033.	offer. This offer provided for 750 MW export and 350 MW to a substation at Weston Marsh. It is considered that the outcomes of the EIA would not be materially different, if the assessment years moved further into the future than currently assumed in the ES, noting commencement of construction is ultimately controlled by the seven year deadline from the grant of consent as set within the Draft DCO [REP1-006]. This is set out in ES Chapter 4: Overview of the EIA Process [APP-055] with a detailed sensitivity analysis provided within Sensitivity Analysis - Connection to the National Electricity Transmission Network [AS-029].
1.8	Cumulative development and coordination	Comments regarding cumulative effects with Grimsby to Walpole and whether timely and meaningful coordination has been undertaken to reduce the combined infrastructure imposed upon the landscape, agricultural land, transport network and communities. 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;	Cumulative effects assessment with Grimsby to Walpole has been provided within each of the technical chapters of the ES. The Statement of Common Ground with NGET [REP1-089] summarises the engagement undertaken to date, which included design workshops leading up to the submission of the Application. Figure 2-1 of the Inter-Relationships with Other NSIPs Report [APP-267] illustrates the Scheme in relation to other NSIP schemes within 25km. Section 3 of the report summarises the engagement with NGET and Outer Dowsing regarding their projects near Weston

Reference	Topic	Summary of Matter Raised	Applicant's Response
		• 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.	Marsh. Table 2-1 provides an overview of the overlap of the indicative programmes for the cumulative projects and the Scheme. Further figures to illustrate cumulative projects adjacent to the Scheme are provided within ES Figure 4-1 [APP-086] and ES Figure 4-2 [APP-087]. ES Chapter 3: Alternatives and Design Evolution [APP-054] sets out alternative options considered, including a 'tee-in' connection to NGET's Grimsby to Walpole overhead line, which was ruled out as an option upon NGET's request. The OCEMP [REP1-061] and OCTMP [APP-278] commit to further engagement with cumulative projects to explore opportunities to combine mitigation, including Grimsby to Walpole and WMEL, in order to reduce cumulative impacts. These opportunities would be considered further post-consent once further details of these projects are better known.
1.9	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	As set out under Agenda Item 6: Interrelationships with other projects in the Written Summary of Oral Submissions at ISH1 [REP1-098], the Applicant has progressed the Scheme in accordance with the applicable policy framework, which enables

Reference	Topic	Summary of Matter Raised	Applicant's Response
		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.	applications to progress in advance of final formal grid connection agreements. The Applicant and NGET are currently negotiating a bespoke set of protective provisions for the benefit of NGET, the parties are also considering provisions that would 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. The Applicant has provided the updated status of negotiations within the Statement of Common Ground with NGET [REP1-089].

Meridian Action Group (MAG) [REP1-135]

The following points have been responded to within Section 5.7 of the **Relevant Representations Report** [REP1-074] submitted at Deadline 1:

- Loss of BMV land and the consequent threat to food security, including comments regarding the area of BMV land and site selection process;
- Impact on the local community due increased construction traffic, noise, visual impacts, and wildlife disruption;
- Impact on existing infrastructure, including roads which are not considered suitable for heavy vehicles and machinery.

New queries raised in the Meridian Action Group Written Representation are addressed in the table below.

Table 1-2 Responses to new queries raised in the Meridian Action Group Written Representation

Reference	Topic	Summary of Matter Raised	Applicant's Response
2.1	Loss of BMV land	MAG have previously submitted their view that the proportion of BMV land is flawed. The review findings of Reading Agricultural Consultants (RAC) reinforce the concern. Request that the subject of land quality is revisited with independent land consultants being retained to review and recalculate the land quality using the ALC methodology funded, but not managed, by Meridian Solar.	The Applicant disagrees that the assessment of agricultural land quality in the Application is flawed. The Applicant would note that RAC's critique of the ALC survey is based on predictive mapping and historic data. Predictive ALC mapping assumes effective under-drainage of soils, which then allows the land to achieve BMV status. However, drainage requires maintenance; the effectiveness of tile drains and mole drains should not be assumed. Survey evidence indicates that soil wetness was the limiting factor in some areas. For example, root channels into lower soil layers were not observed. The functioning of tile drains, whether perforated plastic or clay, diminishes over time. Tile drains are used in tandem with unlined mole drains that deteriorate through collapse and silting. Differences between

Reference	Topic	Summary of Matter Raised	Applicant's Response
			modelled outputs, historical records and the survey would be expected if under-drainage was not delivering to its full potential. For this reason, predictive mapping and historic data is less reliable than recent field survey. The ALC survey results presented within ES Appendix 5-2 [REP1-028] and ES Appendix 5-3 [REP1-030] provide higher resolution survey information across the Solar Development Area, which is representative of existing, rather than the predictive model conditions. The Applicant would also note that large areas of Grade 3b land were identified by LRA⁵ within the Solar Development Area as part of the reconnaissance survey in 2023-2024. As such, two separate surveys by separate surveyors have concluded Grade 3b ALC classification land within parts of the Site, particularly within Land Parcel D. Furthermore, Appendix A of Applicant's Comments on Local Impact Reports (Doc Ref. 8.33) provides cropping information for the Solar Development Area over the past years. This cropping data is not characteristic of Grade 1 and Grade 2 ALC land throughout the Site, as would be suggested by the

⁵ LRA (2024) Meridian Solar Farm. PEIR Volume III Appendix 9-1: Agricultural Land Classification Survey Report – PV Area. Available at: <https://meridiansolarfarm.co.uk/wp-content/uploads/2025/stage-two-consultation/peir-volume-iii/0901%20-%20PEIR%20Volume%20III%20Appendix%209-1%20Agricultural%20Land%20Classification%20Survey%20Report%20PV%20Area.pdf> [Accessed 28/07/2026]

Reference	Topic	Summary of Matter Raised	Applicant's Response
			predictive mapping, but is indicative of Grade 3a and Grade 3b land within parts of the Site.
2.2	Road Infrastructure	Indicative of the issues related to the roads is the work that is being undertaken to repair and resurface Hulls Drove over half its length. This is a 4 week programme, the road having been extensively patch repaired over the past 2-3 years. This is one of the routes identified for construction traffic for the solar farm. The road is closed along its length with side roads similarly affected. During the construction period there have been 3 burst water mains on side roads likely to have been caused by construction traffic using inadequate roads. The usage of such roads demonstrates the inadequacies of this rural road network and the disruption and disturbance likely to be caused to the local community.	The Applicant acknowledges that Hull's Drove has been subject to maintenance works, temporary closures, and repairs in recent years. To address concerns regarding road condition, the OCTMP [REP1-067] includes commitments to undertake pre-construction, during-construction and post-construction highway condition surveys on roads used by construction traffic. Any damage attributable to the construction phase would be identified in consultation with the relevant Highway Authority.
2.3	Summary	The Scheme demonstrates little understanding of the impact that the proposed solar development will have on the rural Fen community and landscape including flood risk.	The Applicant disagrees with these statements. Comprehensive assessments of landscape and visual effects and flood risk have been undertaken and are presented within ES Chapter 12: Landscape and Visual [APP-063] (and associated figures and appendices) and

Reference	Topic	Summary of Matter Raised	Applicant's Response
			ES Appendix 11-3: Flood Risk Assessment [REP1-050] (and associated annexes).

Appendix B: Comparison of the Applicant and NGET Drafting for Paragraph 79

Appendix B: Comparison of the Applicant and NGET drafting for paragraph 79 (Interaction with Proposed NGET Projects)

Interaction with the Proposed NGET Projects

79. Without limiting any other provision of this Part of this Schedule, the undertaker and National Grid Electricity Transmission Plc must use reasonable endeavours to seek to avoid any conflict arising between the carrying out, maintenance and operation of the ~~authorised development~~ grid connection works and the Proposed NGET ~~Projects~~ Project. For the purposes of this paragraph, “reasonable endeavours” means—

- (a) providing a point of contact for each of the undertaker and National Grid Electricity Transmission Plc for continuing liaison and co-ordination throughout the design, construction and operation of the grid connection works and the Proposed NGET Projects.
- (b) ~~(a) undertaking~~ the undertaker will undertake consultation with National Grid Electricity Transmission Plc on detailed design and programming of the ~~authorised~~ grid connection works, taking into account such reasonable representations as National Grid Electricity Transmission Plc may provide in relation to proposed plans and timetables, and National Grid Electricity Transmission Plc will do the same in respect of the design and programming of the Proposed NGET Projects;
- (c) ~~(b) having~~ both parties will have regard to the anticipated programme of works for the grid connection works and Proposed NGET Projects respectively, and ~~facilitating~~ facilitate a co-ordinated approach to construction programming, land assembly, and the carrying out of the ~~authorised~~ grid connection works and the Proposed NGET ~~Projects~~ Project where reasonably possible so as to seek to avoid unreasonable impedance or interference of either project;
- ~~(e) undertaking consultation on the detailed design and programming of the authorised development to ensure that the design and programme for the authorised development does not unreasonably impede or interfere with the NGET Projects;~~
- (d) where ~~possible, undertaking the placing of ducting or making~~ parties agree further to the above consultation, the undertaker will place ducting and other make provision for the Proposed NGET Projects within its design; and
- ~~(e) providing a point of contact for continuing liaison and co-ordination throughout the construction and operation of the authorised works.~~
- (e) NGET will notify the undertaker of its programme of works for the Proposed NGET Projects, including programme for the user-bay into which the authorised development's grid connection works will connect, not less than 21 days ahead of carrying out the works.

