



Meridian Solar Farm

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Post-Submission Application
Documents

8.35 Post ISH1 Note: Strategic
Site Selection

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1. Introduction

1.1. Purpose of this Note

- 1.1.1. This Post ISH1 Note: Strategic Site Selection forms part of an application by Meridian Solar Farm Limited to the Secretary of State under the Planning Act 2008 (the 'Act') for a Development Consent Order (the DCO Application) for the Scheme. It has been produced in response to Action Point 3 following ISH1 [EV3-008].
- 1.1.2. The purpose of this note is to further explain the process through which the location and broad extent of the Scheme was identified. It brings together the relationship between grid opportunity, land availability, strategic environmental constraints and the subsequent iterative design process.

1.2. Matters Addressed

- 1.2.1. This note provides further explanation of:
- The origin of the Scheme and the relationship between the initial land opportunity and the subsequent grid connection offer;
 - The timing and evolution of the Applicant's engagement with National Grid Electricity Transmission (NGET) and National Electricity System Operator (NESO);
 - The geographical area within which the Applicant considered potential land opportunities and the influence of proximity to the Point of Connection (PoC);
 - The strategic planning, environmental and engineering considerations that informed the identification of a suitable development area;
 - The generating capacity and land requirements of the Scheme, including why smaller land parcels or dispersed land parcels would not necessarily represent reasonable alternatives; and
 - The reasons why the land taken forward was considered suitable for accommodating the Scheme.

2. Policy Context

2.1. National Policy Statement Requirements

- 2.1.1. EN-1, paragraph 4.3.9 is clear that the NPS “does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective”. Nevertheless, EN-1, paragraph 4.3.15 places an obligation on applications to “include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility”.
- 2.1.2. Further, while there is no general requirement imposed upon applicants, there are scenarios within the NPSs which require the consideration of alternatives:

Circumstances within the NPSs	Applicability to the Scheme
Where a scheme would involve the compulsory acquisition of land or interests in land (EN-1, paragraph 4.3.9)	The Applicant has secured the principal land parcels to deliver the solar farm by voluntary agreement although compulsory acquisition powers are still being sought to ensure deliverability as well as to deliver the grid connection between the Solar Development Area and the proposed Weston Marsh Substation. The Statement of Reasons [APP-032] provides further details on how the compulsory acquisition tests have been met for the Scheme.
Where a scheme would be located near a sensitive receptor site for air quality (EN-1, paragraph 5.2.7)	The Scheme is not within an AQMA, with the closest AQMA approximately 10km east at Wisbech. Alternatives are not required to be considered further from an air quality perspective.
Where a scheme would lead to significant harm to biodiversity and ecological conservation interests (EN-1, section 5.4)	ES Chapter 9: Ecology and Biodiversity [REP1-018] does not report significant harm to biodiversity or ecological conservation interests.
Where a scheme would result in an adverse effect on the integrity of a European site that	ES Appendix 9-14: Habitats Regulations Assessment [APP-217] carries out an Appropriate Assessment of the Scheme. It concludes that

cannot be avoided (EN-1, section 5.4)	there would be no adverse effects on the integrity of any European sites.
Where a scheme would be located wholly within or partly within Flood Zone 2 or Flood Zone 3 (EN-1, section 5.8)	In this case, the Sequential Test should be exercised. If following application of the Sequential Test, it is not possible for the Scheme to be located in areas of lower flood risk, the Exception Test can be applied. This provides a method of allowing necessary development, including essential infrastructure, to proceed in situations where suitable sites at a lower risk of flooding are not available. Section 3.3 of this report discusses the consideration of flood risk at the site selection stage, including steering development away from areas at the highest risk of flooding. The Planning Statement [APP-260] discusses the application of the Sequential Test and Exception Test in more detail and should be read in conjunction with ES Appendix 11-3: Flood Risk Assessment [AS-020].
Where a development would be located within a National Park, the Broads or an AONB (now National Landscape) (EN-1, Section 5.10)	The Scheme is not located in or near any national landscape designations, therefore no further consideration of alternatives is required.
Culverting of watercourses (EN-3, Section 2.10)	Culverts have been assessed as a worst-case scenario, see ES Chapter 11 Hydrology and Flood Risk [APP-062].
Where an overhead line will result in particularly significant landscape and visual effects (EN-5, Section 2.9)	As set out in the Planning Statement [APP-260], the landscape and visual effects associated with the overhead line NSIPs are not considered to be 'particularly significant' to necessitate the detailed consideration of alternatives prescribed in paragraph 2.9.15 of EN-5. Notwithstanding the above, the Applicant has provided an indication of the costs and benefits of feasible alternatives within ES Chapter 3: Alternatives and Design Evolution [APP-054].

Where EMF effects would compromise the effective and safe operation of communication, navigation and surveillance infrastructure (EN-5, Section 2.10)	No unacceptable effects from EMF have been identified.
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2.1.3. While it does not strictly require the consideration of alternatives, EN-3, paragraph 2.10.21 requires applicants to demonstrate that the use of any agricultural land is necessary, with poorer quality land preferred to higher quality land.

2.2. Consideration of Alternatives

- 2.2.1. **ES Chapter 3: Alternatives and Design Evolution** [APP-054] describes the alternatives assessed from an EIA Regulations compliance perspective with consideration against NPS policy as relevant.
- 2.2.2. This note does not seek to repeat those assessments. It provides additional explanation of the strategic considerations that influenced the site selection, including the relationship between the grid connection opportunity, the geographical scope of the search, land availability, environmental and physical constraints and the requirements of a development capable of making effective use of the 750MW connection offer.
- 2.2.3. Although there is no general policy requirement to demonstrate that a proposed development represents the single best option, the Applicant has had regard to those circumstances in which national policy requires or expects alternatives to be considered. Of particular relevance to the Scheme are the sequential approach to flood risk, the preference for poorer quality agricultural land where development of agricultural land is demonstrated to be necessary, the avoidance of unacceptable effects on protected sites and landscapes, and the consideration of routeing alternatives for electricity network infrastructure
- 2.2.4. These matters were not treated as separate or determinative tests at the strategic site selection stage. They were considered together with the technical and operational requirements of the Scheme to determine whether potential land opportunities represented realistic and deliverable alternatives.

3. Development Need and Grid Opportunity

3.1. Overview

- 3.1.1. This section explains the circumstances from which the Scheme emerged and the relationship between the initial land opportunity and the subsequent grid connection offer. These matters provide important context for the Applicant's approach to site selection. The Scheme did not originate from an unrestricted search for land on which to develop a solar generating station at any location. It developed from the combination of an available land opportunity and the prospect of connecting substantial new generation capacity to the planned transmission network in the Weston Marsh area.
- 3.1.2. The initial landholding was not itself sufficient to accommodate development capable of maximising the available connection capacity subsequently secured. The Applicant therefore considered whether additional suitable and available land could be identified within a realistic distance of the emerging PoC. The Applicant also undertook an appraisal of the initial land offering at the time for its suitability, in reference to its broader land search for additional and available land.

3.2. Initial Land Opportunity

- 3.2.1. Downing Renewable Developments, an established solar and BESS developer across England and Scotland, was approached in 2021 by a landowner interested in the development of solar PV generation at Land Parcel D. This site was approximately 260 hectares (ha) and considered suitable for generating approximately 240MW of electricity.

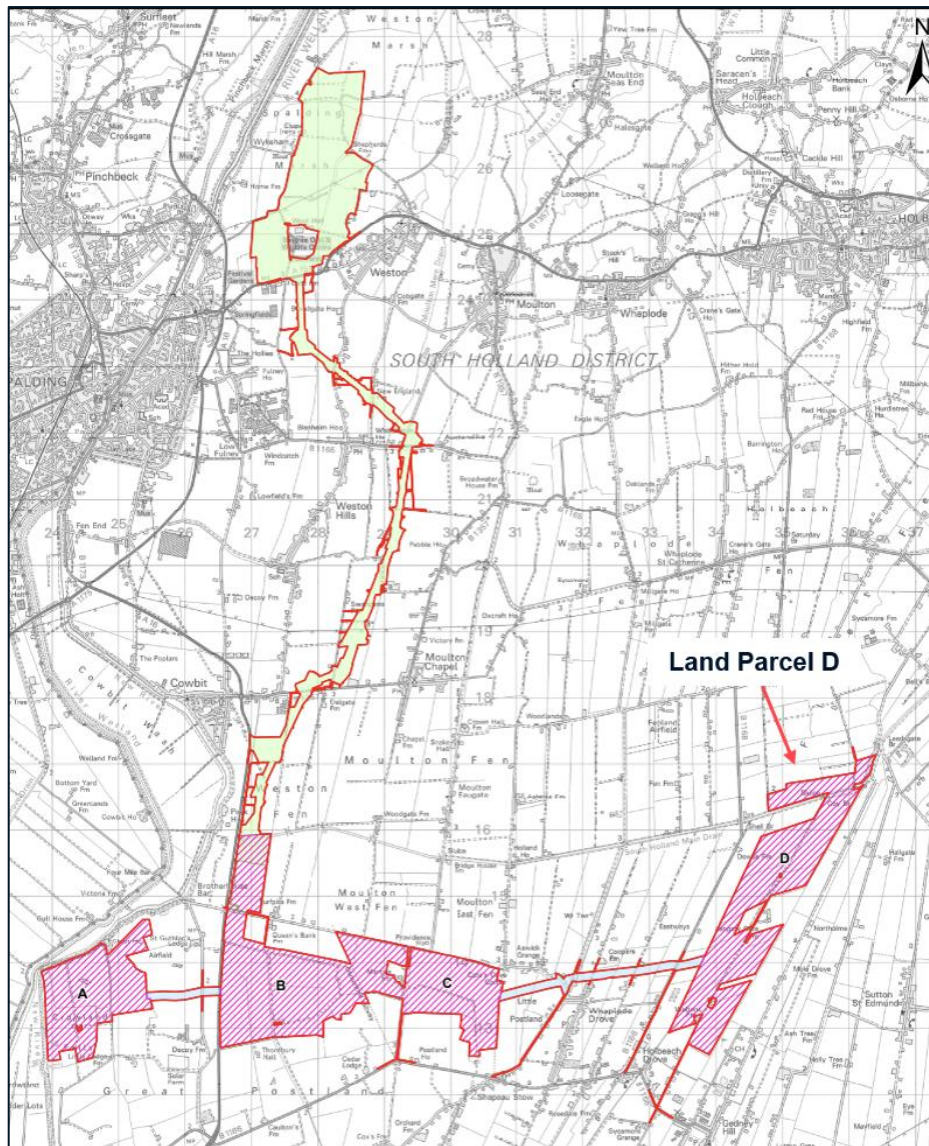


Figure 3-1 Location of Land Parcel D (illustration shows the Order Limits as presented for DCO Application rather than at the point of site selection)

3.3. Securing a Grid Connection Opportunity

- 3.3.1. This prompted the Applicant to explore available grid capacity and emerging transmission infrastructure in that area. Discussions with NGET indicated that there was spare capacity in the area with new transmission infrastructure coming forward as part of the planned Grimsby to Walpole project. The exact location of a potential PoC was not yet known, however, NGET confirmed that the PoC was likely to be between Spalding and Walpole.

- 3.3.2. The Applicant subsequently secured a grid connection offer for 750MW from NESO. The exact location of the PoC remained unconfirmed.
- 3.3.3. To make the most of the available grid capacity, the Applicant would need to secure between 1,000 and 1,200 ha of land.

3.4. Evolution of the Point of Connection

- 3.4.1. The location and configuration of the proposed PoC evolved as NGET developed its proposals for the Grimsby to Walpole project. The Applicant's site selection and design process responded to the information reasonably available at each stage. The chronology below explains the relationship between the initial land opportunity, the grid connection offer, the Applicant's engagement with NGET and NESO, and the subsequent refinement of the Grid Connection Route:

2021:

- The Applicant was approached by landowner interested in the development of solar PV generation at Land Parcel D. This land was likely to be capable of a generating capacity of 240MW.

2022:

- **Early 2022:** The Applicant entered into discussions with NGET to understand the likelihood of available grid capacity in the area within which Land Parcel D was located. It was informed of the planned Grimsby to Walpole project and additional capacity it would bring to the area, and that a larger scheme could be accommodated. The Applicant subsequently submitted an application for a grid connection to National Grid. The Applicant started to consider potential sites appropriate for solar development in the general vicinity, in addition to Land Parcel D.
- **November 2022:** The Applicant received a grid connection offer from National Grid. This confirmed a connection would be facilitated by a spare bay within the design of a new Weston Marsh 400kV substation. The location of this substation was not confirmed but was informed to be between Spalding and Walpole.

2023:

- The Applicant renewed focus on land assembly for the Scheme to maximise the grid connection offer received, including appraisal of the suitability of Land Parcel D, and identifying other willing landowners for inclusion (Land Parcels A, B and C). An additional landholding to the east of Land Parcel D

was initially identified, however, a voluntary agreement was not able to be reached as the landowner withdrew from the Scheme.

2024:

- **January 2024:** NGET held a non-statutory consultation for its Grimsby to Walpole project, which introduced a 'preferred siting zone' for the Weston Marsh substation. Following publication of this siting zone, the Applicant took into account this area as it progressed design development. The Applicant subsequently undertook a statutory consultation with its Grid Connection Route connecting into this zone.
- **Early 2024:** The Applicant requested NGET consider approving a 'tee-in' connection to the planned Grimsby to Walpole scheme in mid-2024. This scheme comprises a new high voltage transmission line which passes close to one of the land holdings identified by the Applicant. A tee-in would avoid the requirement for a connection directly into the planned Weston Marsh substation, thus substantially reducing the length of the connection required.
- **May - July 2024:** Scoping Report submitted to the Planning Inspectorate, and Scoping Opinion received. The Applicant also conducted its Stage 1 Consultation. The Scheme at this stage included the preferred siting zone for the new Weston Marsh substation, with two Grid Connection Corridors appraised.
- **September - October 2024:** NGET initially advised in September 2024 that a tee-in connection to its Grimsby to Walpole project could be feasible, and the Applicant would be required to submit a Mod-App to the connection agreement as soon as practical. However, at the end of October 2024, the Applicant was informed by NGET that a Mod-App for a tee-connection would not be accepted and should not be submitted, and on this basis, only a connection into the future Weston Marsh substation was considered for the delivery of a grid connection.
- **Mid-Late 2024:** The Applicant reviewed the responses to the consultation and undertook further studies to characterise the site. This led to changes to the siting of infrastructure within the Site and selection of the Grid Connection Route.

2025:

- **April - June 2025:** The Applicant held its Stage 2 Consultation consulting on its refined proposals.

- **June 2025 - August 2025:** NGET held another consultation for its Grimsby to Walpole project. This expanded the 'preferred siting zone' for the substation as it was considering whether one or two new substations would be required at the Weston Marsh area. This area was greater in size than the preferred siting zone presented within the 2024 proposals to account for the two potential substations and a connection point for the newly announced Weston Marsh to East Leicestershire project.
- **September - October 2025:** The Applicant amended its proposals to reflect the broader siting zone proposed by NGET for the substation near Weston.
- **November - December 2025:** NGET held a targeted consultation on its proposals for two new substations at Weston Marsh. This identified the indicative location for two substations (Weston Marsh A and Weston Marsh B).
- **December 2025:** The Applicant was assigned a Gate 1 offer by NESO as part of its reform of the grid connection system across the UK.

2026:

- **January 2026:** The Applicant subsequently amended its anticipated PoC to reflect a connection into Weston Marsh B and consulted on these changes in January 2026. These changes form the proposal set out within the DCO Application.

3.4.2. This chronology demonstrates that the land assembly process and the evolution of the PoC progressed in parallel. At the time the additional land opportunities were being considered, the final location of the Weston Marsh substation had not been confirmed. The Applicant had to consider both the availability and suitability of potential Solar Development Areas and their ability to connect to the broad area within which the PoC was expected to be located.

3.4.3. As further information became available from NGET, the Applicant reviewed and refined the proposed connection arrangements. This included consideration of a tee-in connection to the planned Grimsby to Walpole overhead line and, once NGET confirmed that a Mod-App for that option would not be accepted, progression of a direct connection to the future Weston Marsh substation.

4. Defining a Search Area

4.1. Overview

- 4.1.1. The identification of a realistic geographical area within which to consider potential land opportunities was influenced first by the approach from the Land Parcel D landowner, and then, once engagement with NGET had confirmed there was available connection capacity in the surrounding region, by the emerging location of the PoC and the infrastructure required to connect the Scheme to it. This involved the Applicant undertaking an initial appraisal of Land Parcel D and the land surrounding it, as well as a broader search of the area surrounding the emerging PoC.
- 4.1.2. At the commencement of the site selection process, the precise location of the Weston Marsh substation had not been confirmed by NGET. The Applicant therefore did not apply a rigid radius from a fixed connection point. Instead, the Applicant considered available land opportunities within approximately 15 km of the indicative PoC information available at that time, while also considering the environmental, engineering and commercial implications of the required Grid Connection Route.

4.2. Establishing the Area of Search

- 4.2.1. The initial Land Parcel D landowner which instigated the Applicant's search within this area remained willing to enter into an agreement with the Applicant. The Applicant undertook an initial appraisal of Land Parcel D and the land surrounding it in the first half of 2022, considering whether the land provided a suitable starting point for a development of the type proposed. As Land Parcel D alone was not sufficient to make full use of the grid connection capacity applied for, the Applicant also considered the availability and suitability of additional land in the surrounding area.
- 4.2.2. As set out in the **Site Selection Report** [APP-264], the Applicant did not adopt a rigid search boundary because the precise location of the Weston Marsh substation had not been confirmed at that stage. It nevertheless considered the availability of land within approximately 15 km of the indicative PoC information available at the time, namely that the substation would be located between Spalding and Walpole.

- 4.2.3. The Applicant considered that this represented a realistic distance within which a 400 kV overhead line connection could potentially be delivered. It also provided a sufficiently broad area within which to consider land availability and the distribution of environmental and physical constraints, including circumstances in which land closest to the emerging PoC was unavailable or materially constrained.
- 4.2.4. It was not applied as an absolute threshold or as a substitute for considering the characteristics of individual landholdings or the route required to connect them to the transmission network

4.3. Strategic Consideration of Grid Connection Constraints

- 4.3.1. Proximity to the PoC was not considered isolation. The Applicant also considered the infrastructure that would be required to connect any potential development area to the transmission network and the planning, environmental and engineering constraints that such infrastructure may need to traverse.
- 4.3.2. In this case, the Applicant's preferred technology choice was a 400 kV overhead line, which is consistent with the strong starting presumption at paragraph 2.9.21 of NPS EN-5.
- 4.3.3. A site located farther from the PoC would not necessarily represent a reasonable alternative simply because land was available or subject to fewer constraints at a potential Solar Development Area site itself. Consideration also needed to be given to the length and complexity of the connecting infrastructure, including the potential need to cross major watercourses (such as the River Welland), internationally or nationally designated sites, settlements and other physical constraints.
- 4.3.4. The area considered by the Applicant reflected both a realistic connection distance and the ability to identify a potentially deliverable route between the generating infrastructure and the PoC.

5. Strategic Considerations Influencing Site Selection

5.1. Overview

- 5.1.1. The identification of potentially suitable land required consideration of both the generic factors relevant to solar photovoltaic development and the particular characteristics and requirements of the Scheme.
- 5.1.2. EN-3, paragraphs 2.10.10 to 2.10.40 set out the generic factors that may influence site selection and the design of solar photovoltaic generation proposals. These are:
- Irradiance and site topography
 - Network connection
 - Proximity of a site to dwellings*
 - Agricultural land classification and land type
 - Accessibility
 - Public rights of ways*
 - Security and lighting*¹
- 5.1.3. EN-3 recognises that these factors are not exhaustive and that site selection will also be influenced by considerations specific to an individual project. For the Scheme, these included the location and capacity of the available grid connection, the presence of international and national designations, the amount and configuration of land required, land availability, and the ability to deliver a coherent and integrated development.
- 5.1.4. The Applicant also considered the requirements of EN-5 relevant to the routing and design of electricity network infrastructure, including the Holford and Horlock Rules. Potential solar development areas could not therefore be assessed independently of the infrastructure that would be required to connect them to the PoC.

* Proximity of infrastructure to individual dwellings, public rights of way, and security and lighting have not influenced site selection at a strategic level, and are therefore not discussed in further in this note. The applicability of these factors are discussed in the Design Approach Document [APP-268].

- 5.1.5. The following sections explain how these strategic considerations influenced the geographical focus of the search and the identification of the land taken forward. The subsequent application of detailed design principles within the identified Site is described in Section 4.4 of the **Design Approach Document** [APP-268].
- 5.1.6. At the strategic site selection stage, it would not have been proportionate to undertake detailed environmental surveys, hydraulic modelling or soil sampling across the entirety of the potential area of search. The Applicant relied upon the best publicly available information available at the time, together with discussions with NGET and available information regarding the emerging transmission network, to identify land opportunities suitable for further consideration.
- 5.1.7. This included information relating to environmental designations, flood risk, agricultural land classification, topography, access and network connection opportunities. More detailed technical investigations were subsequently undertaken as part of the design evolution and environmental assessment process once the broad extent of the Site had been identified.

5.2. Irradiance and Topography

- 5.2.1. Two key factors when determining the location of a solar development are topography and irradiance (sunlight). Solar PV generation can be found across the UK at a wide variety of latitudes; however, their efficiency is driven by levels of irradiance at their location. Topography helps to maximise these irradiance levels, with flat land being most optimal as there is less shading on the panels, allowing for a better energy yield in comparison to undulating land. Flat topography is also preferential for construction and is generally less visually intrusive to the landscape and wider communities.
- 5.2.2. With the above in mind, the East of England (Lincolnshire, Norfolk and Cambridgeshire) benefits from high levels of irradiance and a broadly flat topography in comparison to other UK regions. Lincolnshire was, therefore, a favourable location in which to search for suitable sites and grid connection opportunities.

5.3. Network Connection

- 5.3.1. As described earlier, the grid connection offer for a 750MW connection at the planned Weston Marsh substation was a key consideration in the search for sites. At the point of site selection, the exact location of a potential PoC was not yet

known, however, NGET confirmed that the PoC was likely to be between Spalding and Walpole (see Figure 5-1).

- 5.3.2. It is noted that the Applicant also considered the possibility of a direct connection (tee-in) to the Grimsby to Walpole transmission line as the planned overhead line would pass close to Land Parcel D. However, this was not a guiding consideration to the selection of sites – i.e. the Applicant did not consider all sites within a radius of NGET existing overhead lines or the future Grimsby to Walpole route. This is because, while NGET accommodated initial discussions as to a tee-in, it made clear that any commitment to a tee-in as an alternative form of connection was subject to the Applicant submitting a Mod-App to its original PoC. Before such a Mod-App could be submitted, and the Applicant be able to consider with any certainty a different connection location, NGET withdrew the availability for a tee-in.
- 5.3.3. Following NGET's confirmation that a tee-in connection should not be progressed, the Applicant considered it appropriate that potential development areas could only be considered based on a connection to the future Weston Marsh substation. This reinforced the relevance of both proximity to the emerging substation location and the ability to identify a deliverable route between the Solar Development Area and the Point of Connection.

5.4. International and National Designations

- 5.4.1. The Applicant sought to avoid landscape and nature conservation areas afforded the highest level of protection, including National Parks and National Landscapes, international and national sites (i.e. Ramsar, Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs)) and irreplaceable habitats. Figure 5-1 illustrates the extent of these designations alongside the underlying agricultural land classification. This exercise also included consideration of Land Parcel D and the surrounding area's appropriateness, and whether a grid connection would be required to traverse across or near to such designations.
- 5.4.2. Review of these designations demonstrated that it would be very difficult to identify alternative suitable land holdings to the north and east of Spalding and Walpole due to the widespread presence of these constraints, including proximity to the Norfolk Coast National Landscape, the Wash Ramsar / SAC / SPA, the Wash National Nature Reserve.

- 5.4.3. To manage engineering constraints associated with the crossing of large watercourses, the Applicant discounted land beyond the River Welland.
- 5.4.4. To east of Peterborough lies the Nene Washes Ramsar / SPA / SAC / SSSI site, which has a linear extent along the River Nene. Should any land be identified south of these designations, the transmission connection would be required to traverse these designations, and therefore the Applicant did not consider land beyond those points.

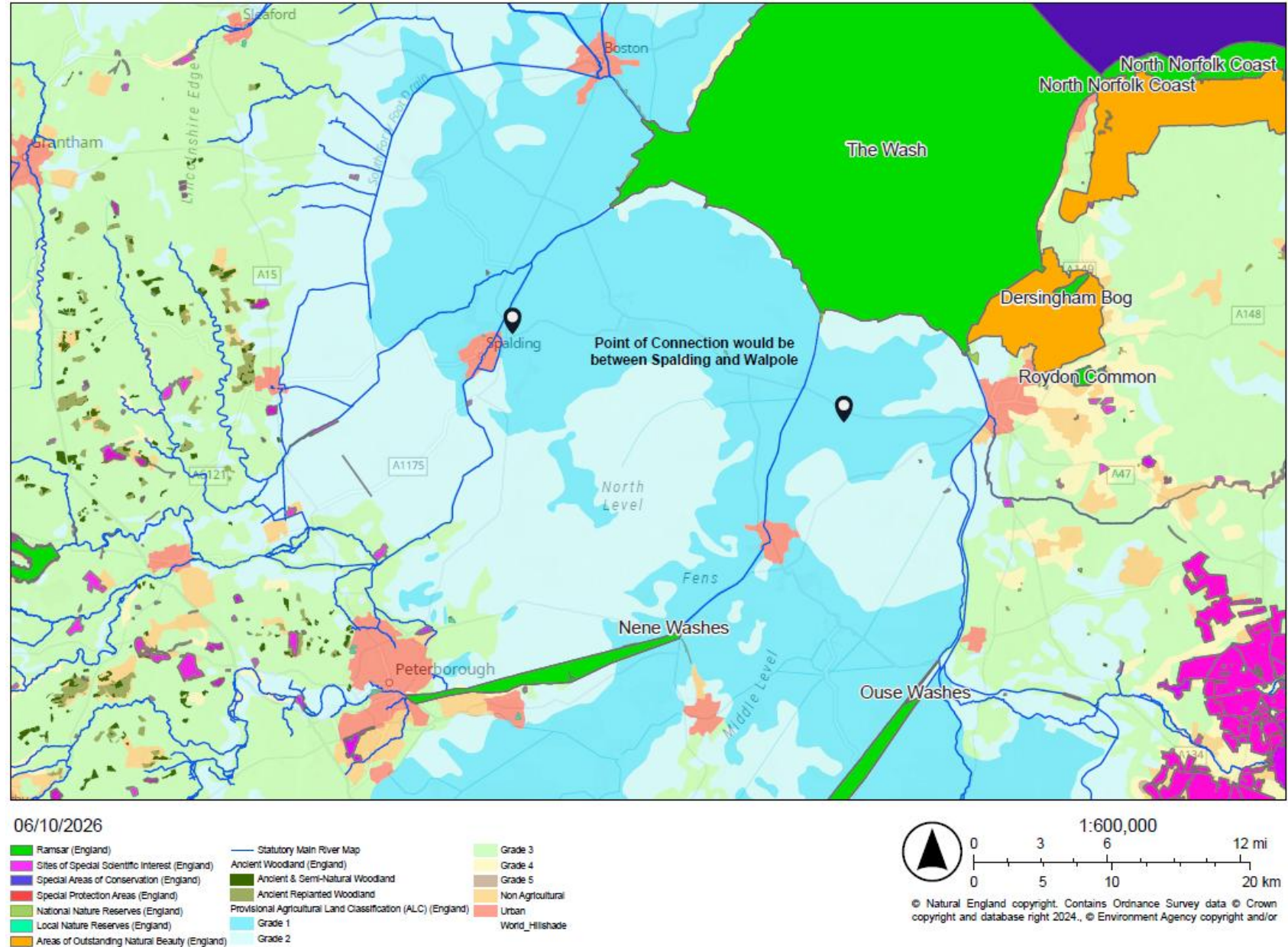


Figure 5-1 Constraints Surrounding the Point of Connection

5.5. Agricultural Land Quality

5.5.1. EN-1, paragraph 5.11.34 states:

“Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”.

- 5.5.2. The Applicant gave consideration to the availability of lower quality agricultural land within the wider area surrounding the PoC. At the early stages of project development, it is not practical or feasible to undertake soil sampling at this scale. The Applicant relied upon information available as part of Defra’s Predictive Land Assessment tool, which provisionally maps the large majority of the area surrounding the PoC for the Scheme as either urban/industrial or with a high likelihood of BMV land, with the land nearest to the PoC likely to be of ‘excellent’ quality, and land further from the PoC likely to be of ‘very good’ quality.
- 5.5.3. Natural England’s Provisional ALC Mapping identifies Grade 1 land closest to Spalding and Walpole, with a greater likelihood of Grade 2 land to the south and west. As illustrated at Figure 5-2, there is very little Grade 4 or 5 land within the search area, demonstrating the lack of alternatives in the vicinity of the PoC with a lower ALC grading that the proposed site.
- 5.5.4. Available brownfield sites at the time were either all within existing built up areas or did not contain any sites of a suitable size for further consideration, with the largest available site at the time being 2.58 ha in the South Holland District Council area, substantially less than the Applicant’s aim for sites of 120 – 160 ha.
- 5.5.5. At this scale, Grade 3 cannot be distinguished into Grades 3a and 3b. Therefore, the very large majority of land surrounding the PoC has potential to be best and most versatile agricultural land. At a macro level, it would not be possible to identify an area approximately 15km from the PoC that is of a suitable size without potentially impacting BMV land.
- 5.5.6. Whilst the area was considered likely to be BMV land, opportunities to predominantly avoid areas provisionally anticipated to be Grade 1 Agricultural Land were feasible for the land which was ultimately selected as the Solar Development Areas when considering Natural England’s Provisional ALC

Mapping. As illustrated on Figure 5-2, the land parcels selected sought to avoid the highest-grade agricultural land based on existing information available.

- 5.5.7. Taking into account the other constraints, and EN-3, paragraph 2.10.22 which is clear that the development of ground mounted solar arrays is not prohibited on BMV agricultural land, and use of BMV where there is co-location with other functions, including storage, in order to maximise the efficiency of land use is recognised at paragraph 2.10.24.

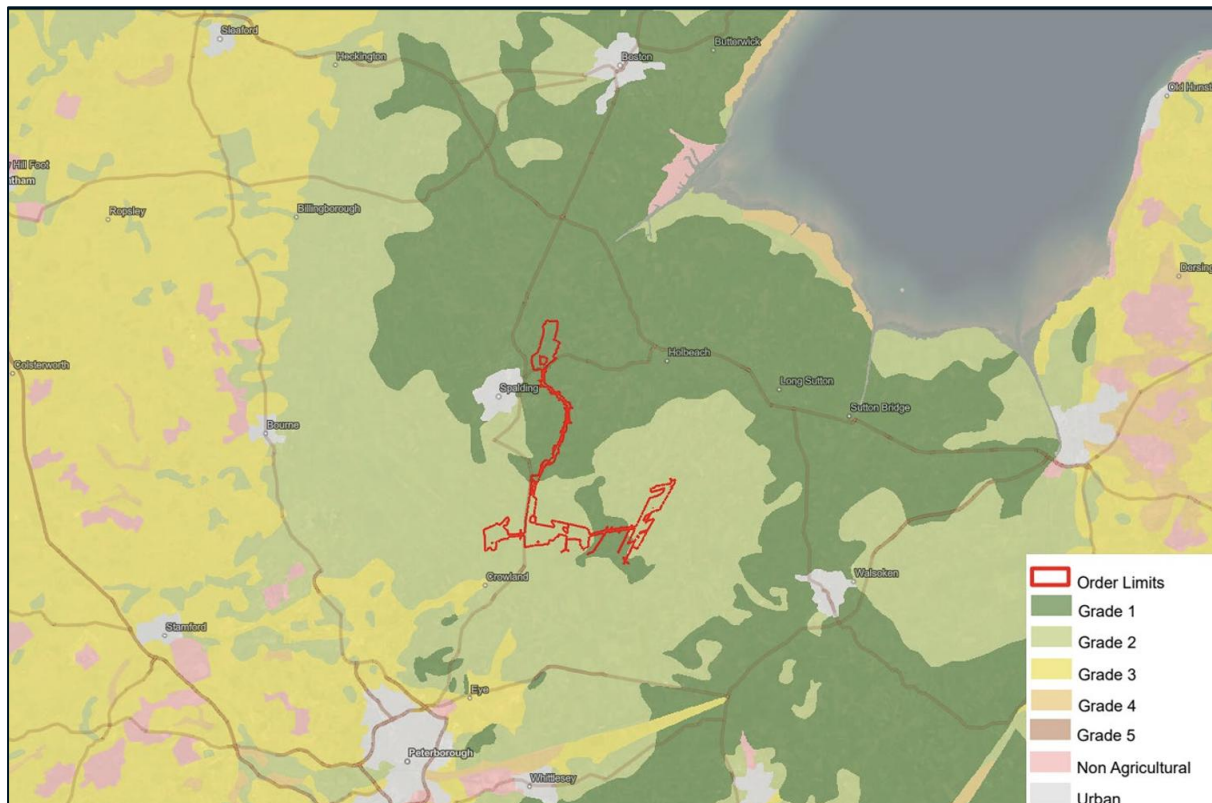


Figure 5-2 Natural England's Provisional ALC Mapping overlaid with the Order Limits

5.6. Flood Risk

- 5.6.1. The Applicant has had regard to the sequential approach to flood risk through the site selection and design of the Scheme. Paragraph 27a of the PPG advises that the area over which the Sequential Test is applied should reflect local circumstances, including the catchment area for the type and scale of development proposed and the need that the development is intended to address. The test should be applied proportionately and should focus on realistic alternatives in areas of lower flood risk that could meet the same development

need. For infrastructure of regional or national importance, the area of search may extend beyond individual local planning authority boundaries.

- 5.6.2. For the Scheme, the relevant development need is not for a solar PV generation project at any location or scale. It is for a transmission-connected solar generating station capable of making effective use of the 750MW connection opportunity at the Weston Marsh substation. The location of that connection opportunity is fundamental to defining a realistic area within which alternative sites could meet the same development need.
- 5.6.3. After broadly identifying the area of interest from the initial potential site identified in Land Parcel D, the Applicant's area of search was driven by proximity to the confirmed PoC. The approximately 15km radius of search was not defined by reference to local planning authority boundaries, which do not materially affect the physical ability to construct or operate the Scheme. Instead, it reflects a proportionate geographical area within which the Scheme could realistically connect to the PoC, while avoiding an unduly long transmission route.
- 5.6.4. The PPG also recognises that, for large-scale development, it may be relevant to consider whether a proposal could be split between two or more lower-risk sites. However, this is caveated by requiring those sites to be capable of accommodating the development in a way that would still serve its purpose effectively. In this context, this requires consideration of whether a combination of smaller sites could collectively:
- Accommodate the generating capacity necessary to meet the identified need (i.e. 750MW);
 - Connect efficiently and in a deliverable manner to the proposed Weston Marsh substation;
 - Accommodate the associated infrastructure, including substations and mitigation;
 - Be assembled, consented and delivered within an equivalent programme; and
 - Operate as an integrated Scheme without requiring an excessive or materially more disperse network of connecting infrastructure.
- 5.6.5. The Applicant did not conclude that lower-risk land was unavailable. Rather, the Applicant concluded that no lower-risk site, or combination of lower-risk sites, was identified that would provide a clearly preferable overall outcome when considered against the Scheme's generating capacity requirements, connection

needs, land availability, environmental constraints and deliverability considerations

- 5.6.6. As illustrated on Figure 5-3, while areas of Flood Zone 1 land exist within the search area, these are generally fragmented and dispersed. The Applicant did not identify any single area of Flood Zone 1 land capable of accommodating development of the scale required to utilise the available 750MW connection opportunity.
- 5.6.7. A configuration relying upon multiple separated areas of lower-risk land would also need to address the additional connection infrastructure required between those areas and the Scheme's 400kV substation. Suitability of a site cannot therefore be determined solely by adding together the smaller areas of individual Flood Zone 1 parcels in the area of search.
- 5.6.8. In addition, not all land within the Solar Development Area ultimately becomes developable area. Environmental buffers, drainage features, landscaping, biodiversity enhancement areas, access tracks and electrical infrastructure all reduce the amount of land available for solar PV panels. The Applicant required flexibility within the overall landholding to respond to constraints identified through survey work and detailed design. This flexibility would be considerably reduced if development were distributed across a series of smaller isolated sites.

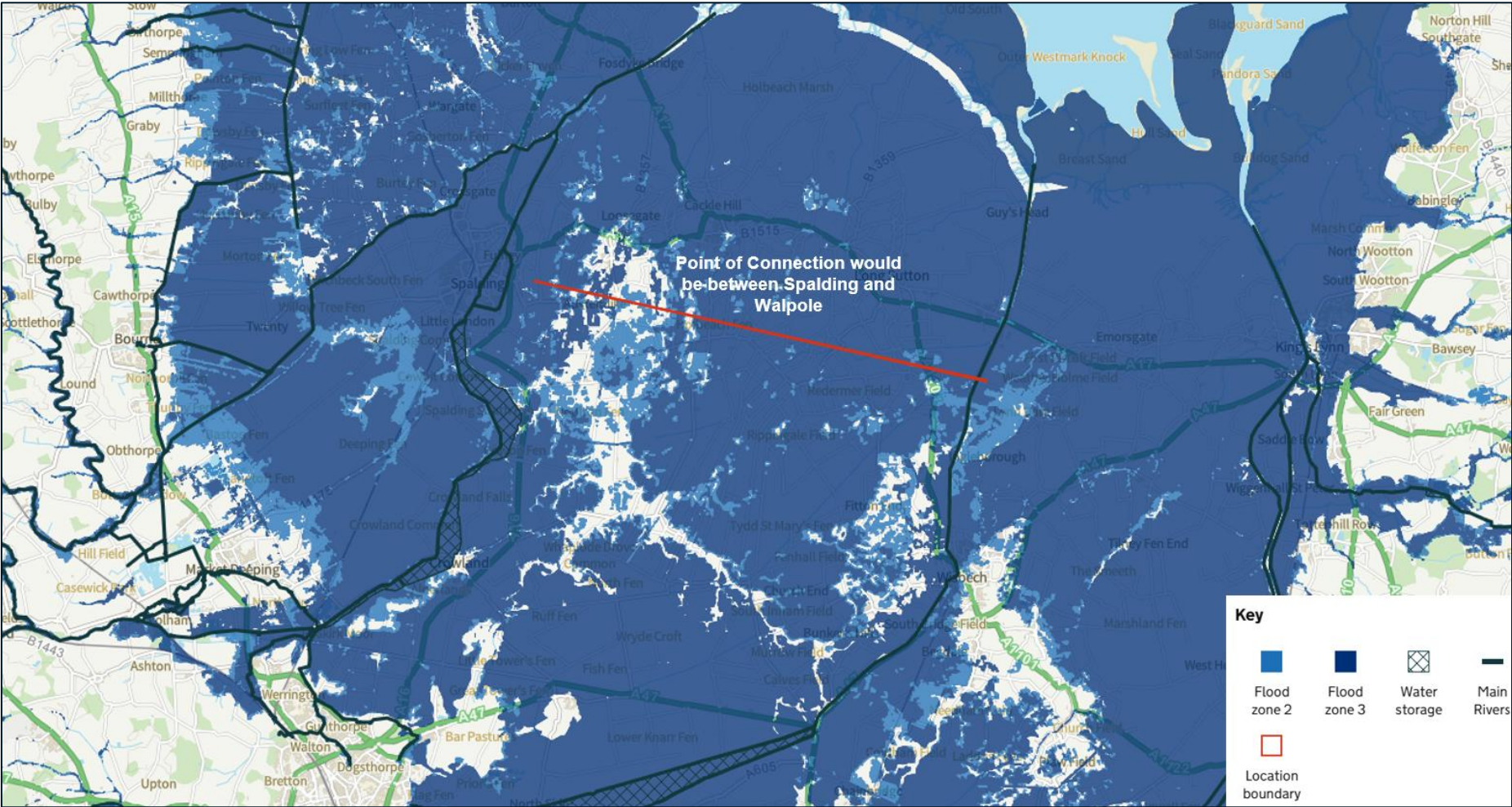


Figure 5-3 Flood Risk for Planning

- 5.6.9. The Applicant also considered the broad distribution of flood risk and other environmental and physical constraints beyond the identified search area. Extending the search into Fenland or Peterborough would not provide an evidently strategic advantage in terms of reduced flood-risk or BMV agricultural land terms.
- 5.6.10. Areas farther west in South Kesteven include more land at lower flood risk and potential less BMV agricultural land, but is much farther from the PoC (approximately 20km to the nearest large area of Flood Zone 1). Development in that direction would require materially longer transmission infrastructure and a crossing of the River Welland and associated flood storage areas, as well as consideration of different topographical and environmental constraints (see discussion further below).
- 5.6.11. The strategic site risk exercise therefore identified the Site as capable of accommodating a coherent development of the required scale within a realistic connection distance. Detailed flood-risk information subsequently informed the design and layout of the Scheme, including the location of development components within areas of differing flood risk. This strategic and within-site approach is detailed within **Post ISH1 Note: Sequential and Exception Test** (Doc Ref. 8.36).

5.7. Accessibility

- 5.7.1. Accessibility was considered at the strategic site selection stage because a solar development of the scale proposed requires suitable access for construction, operation, maintenance and eventual decommissioning. At that stage, the assessment was necessarily high level and considered the relationship between potential land opportunities and the strategic and local highway network.
- 5.7.2. The identified land is located in proximity to the A16, providing access to the wider strategic highway network, which is more suitable than the local road network for sustaining high volumes of traffic. The availability of access from the strategic network was therefore a positive consideration in determining whether the land could be taken forward for more detailed assessment.
- 5.7.3. The suitability of individual access routes, junctions and movements on the local road network was subsequently considered through the transport assessment and iterative design process. Detailed access arrangements therefore formed

part of the assessment and design of the Scheme after the broad Solar Development Area had been identified.

5.8. Other Environmental and Engineering Constraints

- 5.8.1. The Applicant also considered other environmental and engineering constraints capable of influencing the suitability of potential development areas or the deliverability of the associated Grid Connection Route. These considerations were relevant both to land within the broad area of search and to the implications of extending the search farther afield.
- 5.8.2. In particular, the Applicant considered the presence of major watercourses and the potential engineering and environmental implications of crossing them. Land farther west would be separated from the emerging PoC by the River Welland and its associated flood storage area. Identification of a potential Solar Development Area in that direction would therefore need to take account not only of the characteristics of the land itself, but also of the longer and potentially more complex transmission infrastructure required to connect it to the Weston Marsh substation, including a crossing over or beneath the River Welland (which is approximately 40m in width).
- 5.8.3. The Applicant also considered the distribution of settlements and individual residential properties. At the strategic stage, this informed whether sufficient land could be identified to provide appropriate separation between the principal items of infrastructure and nearby receptors and to allow effects to be addressed through the subsequent design process.
- 5.8.4. These considerations did not operate as absolute exclusions in every instance. They formed part of the overall assessment of whether an area could accommodate the Scheme at the required scale while retaining sufficient flexibility to avoid or reduce environmental effects through detailed design.

5.9. Summary

- 5.9.1. Following identification of the various constraints (such as environmental designations, BMV agricultural land and flood risk), no particular area was identified within the search area, that the Applicant considered to be more appropriate than the land near to Land Parcel D. Therefore, the Applicant continued to progress negotiations with other land owners in that area to assemble a cohesive site.

6. Site Assembly and Deliverability

6.1. Overview

- 6.1.1. In addition to the strategic environmental, planning and engineering considerations described above, the Applicant considered whether sufficient suitable and available land could be assembled to accommodate the Scheme as a coherent and deliverable development.
- 6.1.2. This assessment was not limited to the gross area of individual land parcels. It considered whether land was available in a configuration capable of accommodating the generating infrastructure, associated substations, access and connection infrastructure, environmental mitigation and the design flexibility required to respond to constraints identified through survey and assessment.
- 6.1.3. The following sections explain the relationship between the generating capacity secured through the grid connection offer, the corresponding land requirements, the availability of land through voluntary agreement and the benefits of avoiding the unnecessary dispersal of the Scheme over a wider geographical area.

6.2. Generating Capacity and Land Requirements

- 6.2.1. The amount of land required for the Scheme was principally influenced by the capacity available under the grid connection offer and the need to accommodate associated infrastructure, environmental mitigation and design development.
- 6.2.2. The scale of land required for the Scheme was predicated by the grid connection offer secured by the Applicant. The Applicant therefore needed to identify a sufficient overall area of land not only for the generating infrastructure itself, but also to provide flexibility to respond to environmental, physical and operational constraints.
- 6.2.3. A guiding principle for site identification was the consideration of deliverability and availability of land for development. The Applicant sought to identify large land holdings (of approximately 120 to 160 hectares) with close proximity to one another. This is because larger land holdings aid mitigating commercial and deliverability risk associated with multi-party negotiations and provide flexibility for design. Large blocks of land within the holdings are also beneficial for solar PV development as they enable cohesive designs, without loss of land to necessary buffers or other design constraints. A design which incorporates several smaller parcels as opposed to larger, cohesive parcels lose resulting

developable area, as the developable area is smaller than the initial field size due to the requirement for buffers and the consideration of other design constraints. Larger areas of land allow the Applicant to subsequently refine the design within that envelope once the characteristics of a site are better understood.

- 6.2.4. As mentioned, the initial landholding at Land Parcel D was likely to be suitable for approximately 240MW of electricity generation. To maximise the available grid connection, the Applicant therefore needed to identify available sites to fulfil the full 750MW offer (approximately 1,000 – 1,200 ha in total).

6.3. Land Availability and Voluntary Agreements

- 6.3.1. It is generally standard within the industry to secure the land for the Solar Development Area through voluntary agreement. This accords with guidance on the use of compulsory acquisition², which encourages the securing of land by voluntary agreement, with compulsory acquisition only to be relied upon should attempts to acquire land by agreement fail. Given the length of time that solar farms are typically installed for (in this instance where Solar Development Area would be required by the Applicant up to 40 years), it is not considered reasonable to seek permanent acquisition of land without the agreement of the landowner, particularly when there are willing landowners with suitable sites available. As such, site selection for solar farms is not simply a matter of identifying the best location on a map and forcing the release of that land via compulsory acquisition.
- 6.3.2. As set out above, the Applicant was able to enter into voluntary agreement with landowners for the Solar Development Area for sufficient land to maximise the grid connection agreement. Therefore, the consideration of compulsory acquisition of additional land to form part of the Solar Development Area is not deemed necessary.
- 6.3.3. Further, the use of larger more continuous land, in contrast to smaller and scattered land parcels with more landowners, has enabled the Applicant to bring forward proposals for the Scheme in a timely manner due to a reduced number of landowners to negotiate option agreements.

² See paragraph 25 of DCLG (2013). Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land. Accessed September 2026.

6.4. Delivering a Coherent and Efficient Development

- 6.4.1. The Applicant sought to identify additional land parcels in close proximity to the initial landholding. This approach reduced the need for extensive connecting infrastructure (including 132 kV substations) and avoided the dispersal of solar PV infrastructure across a wider geographical area. In doing so, it helped to contain the extent of development and associated effects within a more concentrated area.
- 6.4.2. EN-1, section 4.7 emphasises the importance of achieving good design in energy infrastructure projects. A more continuous development area provides greater flexibility during the iterative design process, allowing environmental constraints, mitigation measures and operational infrastructure to be accommodated within a single development envelope. It can also enable supporting infrastructure, such as internal access tracks and cable routes, to be provided more efficiently.
- 6.4.3. The area surrounding the Scheme contains a number of villages, hamlets, individual properties and farmsteads. To the south-east of the Solar Development Area, settlements including Shepeau Stow, Whaplode Drove, Holbeach Drove and Gedney Hill contain designated heritage assets which contribute to local character and sense of place, including listed churches, the Meridian Stone, St Guthlac's Cross and historic windmills associated with the fenland landscape.
- 6.4.4. A more continuous site has enabled the Scheme to be integrated more sensitively within the landscape, reducing the need for dispersed areas of solar development and the associated infrastructure that may otherwise be required to connect them, such as additional 132 kV substations, cable routes or overhead lines. It also assists in avoiding the perception of development encircling settlements and provides greater opportunity to minimise effects on nearby communities, heritage assets and the landscape through a coordinated design approach.
- 6.4.5. As part of the appraisal as outlined in Section 4 and 5, the Applicant confirmed the appropriateness of Land Parcel D and sought to identify broader land availability. These parcels were identified by reference to their proximity to Land Parcel D and to the emerging Point of Connection, consistent with the area of search described in Section 4.
- 6.4.6. At this stage, the Applicant relied on high-level ALC mapping (see Section 5 and Figure 5-2) to identify land and, where possible, to avoid Grade 1 agricultural land. The detailed, exact grading of the land was not known and could not be established until further survey work was conducted.

- 6.4.7. The Applicant also acknowledges the presence of the flood zones within and around the parcels. This was based on desk-based analysis only (see Sections 5.6 and Figure 5-3), as detailed site-specific flood risk assessment and hydraulic modelling would not have been proportionate at the strategic site selection stage. Where possible, the Applicant favoured land that was near to, or encompassed the edge of, the mapped flood zones.
- 6.4.8. The Applicant recognised the presence of heritage features in the vicinity of Land Parcels B and C. This was a key reason for securing a sufficiently large overall landholding, which provided the flexibility to respond to as the Applicant's understanding of the area developed through detailed survey work. That flexibility allowed the design to be refined rather than being fixed at the point of site selection.
- 6.4.9. The strategic site selection process involved the combined consideration of grid connection, environmental and physical constraints, land requirements, availability and deliverability. The conclusions arising from that process are summarised below.

7. Concluding Remarks

- 7.1.1. The Scheme originated from an initial land opportunity which subsequently aligned with the availability of a 750MW connection opportunity associated with the emerging Weston Marsh substation. The location of that connection opportunity was a key consideration in defining a realistic area of search, reflecting the importance of the network connection recognised in EN-3 and the practical implications of construction and operating a transmission-connected generating station of this scale.
- 7.1.2. In identifying land suitable for further consideration, the Applicant had regard to the strategic distribution of environmental, planning and engineering constraints surrounding the PoC, including internationally and nationally designated landscape nature conservation features, agricultural land quality, flood risk and engineering constraints associated with the delivery of transmission infrastructure. The assessment demonstrates that these considerations need to be assessed collectively rather than in isolation, taking into account both the characteristics of the land required to host the Solar Development Area and the infrastructure required to connect it to the transmission network.
- 7.1.3. The Applicant also considered the specific requirements of a 750MW solar generating station, including the need for sufficient land to accommodate generating infrastructure, substations, environmental mitigation and associated development. Regard was therefore had not only to the overall quantity of land available, but also to its configuration, proximity to other landholdings and ability to function as a coherent and integrated development. Larger and more continuous landholdings provided flexibility during the iterative design process, allowing environmental constraints to be avoided where possible and mitigated where necessary, while reducing the need for additional connecting infrastructure and avoiding the unnecessary dispersal of development across a wider area.
- 7.1.4. The resulting Solar Development Area was taken forward because it provided a combination of proximity to the PoC, sufficient scale, land availability, design flexibility and deliverability. It enabled the Applicant to make effective use of the available connection capacity whilst providing a suitable framework within which environmental considerations could be addressed through the iterative design process.

- 7.1.5. Taking these matters together, the Applicant concluded that the Site represented a suitable and deliverable location for the Scheme and should therefore be taken forward for detailed environmental assessment, consultation and refinement through the DCO process. The assessment did not identify an alternative location within a realistic connection distance that would demonstrably perform better when all relevant planning, environmental, technical and deliverability considerations were assessed together. In doing so, the Applicant had regard to those matters within national policy where alternatives are required or expected to be considered, including flood risk, agricultural land quality, designated sites and landscapes, and the routing of electricity infrastructure. The assessment demonstrates that these considerations can be appropriately addressed through the Site and design taken forward, and that no realistic alternative location was identified which would better satisfy those policy considerations whilst also accommodating a transmission-connected solar generating station of the scale proposed. Nor is there a policy requirement to identify a site free from constraints or the single 'best' site. Rather, the objective of the site selection process was to identify a suitable, coherent and deliverable location capable of making effective use of the available grid connection opportunity, and the Applicant considers that the Site satisfies that objective.

