WATER MANAGEMENT ALLIANCE

EN010169 MERIDIAN SOLAR FARM PLANNING EXAMINATION

EXAMINING AUTHORITY'S WRITTEN QUESTIONS 1 (ExQ1): SOUTH HOLLAND INTERNAL DRAINAGE BOARD response

27th October 2026

ExQ1	Question to:	**Question:**	**South Holland Internal Drainage Board (SHIDB) response:**
Q2.0.4	South Holland Internal Drainage Board	**Pylons and clearance height** South Holland Internal Drainage Board (SHIDB) has requested a clearance height for the overhead electricity lines of 18m to accommodate the maximum machinery height plus 7m clearance, which the applicant understands is based on Health and Safety Executive GS6 guidance. In the Relevant Representations Report [REP1-074], the applicant sets out its approach with reference to the legislation and a hierarchy of standards, which results in a significantly lower clearance requirement. Please respond to this and confirm if the approach is agreed. If not, explain what is required and	SHIDB refers to ENATS 43-8 (Technical Specification published by Energy Networks Association) Revision 5 2019 for guidance relating to safe working practices under electricity lines. Whilst we appreciate that the Applicant is proposing minimum overhead cable heights greater than the statutory minimum height above ground level, SHIDB does not accept the applicant's proposed cable heights because their approach does not account for the Board's particular requirements. The Applicant justifies its position by referring to "existing transmission and distribution assets across the country… that oversail IDB watercourses" that do not achieve the clearances required by SHIDB. However, in this the Applicant has not acknowledged that the South Holland internal drainage district contains particularly wide and deep arterial drainage watercourses that are not typical "across the country", and that require maintenance by SHIDB using particularly large, long-reach machinery working on the watercourse banks. Ultimately this is an issue of ensuring operatives are not put at risk of electrocution. If adequate safety clearances are not ensured, SHIDB cannot undertake its essential maintenance and/or

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		provide justification for this in the context of legislation, policy and guidance.	emergency work to ensure the efficient functioning of the land drainage network. SHIDB has reviewed the specific locations for each proposed overhead line crossing over an arterial watercourse, in the context of the size of machine that is required to carry out the IDB's work there, and the height of any existing electrical cables. This has resulted in SHIDB accepting the proposed heights at seven of the ten 400kV crossings. SHIDB has requested that the Applicant raises the heights at the remaining three crossings to accommodate SHIDB's safety clearances. This matter remains under discussion. SHIDB is also waiting for the Applicant to provide the proposed heights of the four proposed 132kV overhead cables within the solar array area, for the Board's consideration. This matter therefore remains **not agreed**.
Q19.0.12	South Holland Internal Drainage Board	**Crossings** The proposal would introduce more than 100 crossings within this drainage board district. The applicant has responded to concerns raised by SHIDB about the design of these in the SoCG [REP1-087]. Please can SHIDB confirm if:	The Applicant's response to SHIDB's concerns, set out in the SoCG [REP1-087] refers to *Environmental Statement Chapter 11 Hydrology & Flood Risk (Doc 6.1 Rev 1)* and *ES App 11-2 Water Framework Directive report (Doc 6.3 Rev 1)*, and an assessment for each water feature (watercourse) based on assumed reasonable worst-case parameters for a proposed structure within *Tables 11-9 (Solar Development Areas / inter-array connections) and 11-10 (Grid Connection Route) of ES Chapter 11*. These tables assess the impact of the project on water feature (watercourse) hydromorphology (the size and shape of channels and how these affect water flow) in relation to ecology rather than

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		• In its opinion, whether the assessment now represents a 'reasonable worst-case'.	functioning as a drainage asset. This skews the assessment of impact on watercourse hydromorphology since the baseline importance for channel morphology (presented in *Tables 11-7 and 11-8 Importance of receptors of ES Chapter 11*) is described to be of "low importance on the basis of … modification including channel straightening, a trapezoidal planform and being over-deep". The assessment argues that since the watercourses are already modified, of trapezoidal planform and over-deep, they have a lower baseline importance than if they had been of a more natural form (e.g. meandering, non-trapezoidal and more shallow). SHIDB would argue that this assessment fails to recognise that these watercourses are designed and maintained with these hydromorphological characteristics to efficiently convey water away from the extremely low-lying land in this region to enable the land to be used – primarily for agriculture. SHIDB therefore does not agree with the baseline level of importance of water features presented in the Environmental Statement. ES Table 11-7 suggests "low" importance for multiple watercourses that are of arterial importance in the South Holland drainage network, including several that SHIDB considers to be of "higher" importance because of their size and significance. Although the "low" importance rating presented by the applicant can be argued in terms of biological value, this fails to acknowledge the important flood risk function of the arterial watercourses that could be affected by the project's installation of multiple culverts and or bridges. SHIDB therefore suggests that the finding of "minor adverse" impacts underplays the potential impacts of the project on the land drainage network.

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			The Hydrology Impact Assessment Summary Tables (Appendix 11-6, doc. Ref APP_234) and ES Chapter 11 (*Tables 11-9 and 11-10*) find "slight adverse (not significant)" impact on water features (watercourses) resulting from scheme interactions. This impact magnitude is derived in part from the suggested "low importance" of the watercourses in terms of hydromorphology, which SHIDB does not consider to be a true reflection of their drainage function. However, although SHIDB considers this assessment has not fully considered the watercourses in terms of their drainage function, we do not disagree that the impact of the scheme on each water feature is likely to be slight adverse. As a final consideration in relation to the assessment, SHIDB would like to highlight two further points on this matter: • In the case of bank slippage as a result of works affecting watercourse banks, (for example upon removal of a temporary crossing), the impact level would increase from minor to moderate adverse; this does not appear to have been considered in the assessment; • The cumulative impact from so many "slight adverse (not significant)" impacts within the drainage network, e.g. multiple culverts in relatively close proximity along particular stretches of watercourse, as detailed below, could be significant. •
		• Whether sufficient mitigation is secured	SHIDB is satisfied that the range of mitigation / enhancement measures described in the OCEMP is likely to minimise potential

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		through the OCEMP [REP1-061].	impacts on watercourses from the construction phase of the project.
		• Whether the statement in ES Chapter 11 [REP1-020] that 'the least impacting design that is reasonably practicable will be installed' is sufficiently secured in the dDCO [REP1-006] and that this is sufficiently precise and enforceable.	SHIDB is not clear on how the dDCO secures the statement in ES Chapter 11 that "the least impacting design that is reasonably practicable will be installed" and therefore requests clarification on this point. SHIDB will provide advice regarding design for watercourse crossings at the detailed design stage, as set out in the protective provisions of the dDCO.
		• Whether a commitment in Appendix 11.2 [REP1-046] to 're-use existing culverts where possible' is adequately secured via the Environmental Mitigation and Commitments Register [APP-272] and the Watercourse Crossing Schedule [REP1-026]. If not, what is required?	SHIDB's concern here is that the project could result in multiple new and existing culverts in relatively close proximity along particular stretches of watercourse. This would be problematic for SHIDB in terms of maintaining the watercourse (culverts obstruct channel and bank maintenance) and in ecological terms (culverts create barriers to movement of riparian wildlife). Multiple culverts can also increase flood risk if dimensions of existing structures are not properly accounted for in design – hence the importance of establishing an appropriate IDB approval process in the protective provisions. SHIDB therefore encourages the use of existing crossings over the installation of new crossings. The Environmental Mitigation & Commitments Register [APP-272] refers to the OCEMP [REP1-061] commitment for "good practice measures for construction of watercourse crossings for access

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			tracks, including reusing existing crossings, where reasonably practicable". The Watercourse Crossing Schedule [REP1-026] lists either "new" or "exiting upgrade" for works, but the applicant has emphasised that crossing locations have not been finalised. SHIDB has requested discussions with the Applicant to consider the best crossing option at each proposed crossing location, but the applicant has advised that such discussions would be better at the detailed design stage. SHIDB is seeking assurance that there will be sufficient flexibility in the DCO to allow use of existing crossings if practicable, if crossing locations have not been finalised before the DCO is granted. It is essential that the discussions at detailed design stage will include discussion on *location* of crossings, and that the wording of relevant documents allows the best location to be agreed through these discussions. SHIDB wish to see a guarantee that location will be one of the design details considered during the SHIDB approvals process (set out in the protective provisions).
		• SHIDB is content that detailed design is done post-consent, given the proposed design principles set out in the OCEMP [REP1-061] and Design Parameters [REP1-055], the proposed protective	SHIDB is content that detailed design is done post-consent, so long as: (i) mitigation/enhancement measures set out in the OCEMP are secured in the CEMP and Water Management Plan; and (ii) agreement is achieved between SHIDB and the Applicant on appropriate wording within the protective provisions relating to IDB approval of detailed designs and conditions SHIDB may impose on these. SHIDB is currently negotiating wording of the protective provisions with the Applicant.

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		provisions and requirement for approval by SHIDB.	SHIDB continues to discuss with the Applicant the matter of overhead line height over arterial watercourses where the proposed heights would be insufficient to allow safe operation of SHIDB machinery (please see Q.2.0.4 above).
		• It is satisfied by the proposals for inspection and maintenance of the crossings during operation, as set out in the OOEMP [REP1-063].	The Outline Operational Environmental Management Plan sets out that watercourse crossings will be inspected regularly and a maintenance programme implemented, in accordance with good practice guidance. SHIDB is satisfied with this proposal for the operational stage of the project, partly because SHIDB will provide advice on crossing specifications to ensure design is appropriate for location and proposed usage, as part of the approvals process set out in the protective provisions for SHIDB. SHIDB would highlight that some form of inspection / monitoring also will be required at locations where the Project's crossings have been removed, since it is likely that watercourse banks could undergo slippage following the removal of crossings. The Applicant should provide some form of commitment to this additional inspection / monitoring.
Q19.0.15	South Holland Internal Drainage Board	**Access to Watercourses** SHIDB has raised concerns about encroachment into the Board's access strips and interrupted watercourse access near proposed haul roads. The applicant has responded to these concerns in the SoCG [REP1-087]. Please can	SHIDB welcomes the mitigation measure set out in Table 3-7 of the Outline Construction Environmental Management Plan (doc ref REP1-061) that, "*The Principal Contractor will ensure continuous engagement with South Holland Internal Drainage Board and North Levels Internal Drainage Board to ensure physical maintenance access to their managed watercourses throughout the preconstruction period and construction period. Unhindered operational and maintenance access to all IDB-managed watercourses will be preserved at all times.*"

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		SHIDB confirm if protective provisions requiring alternative access are sufficient to assuage its concerns? If not, why not?	This mitigation in the OCEMP is stronger than the protection of access set out in the draft protective provisions for SHIDB [within the draft DCO [REP1-006], which is set out as follows: "*If by reason of construction of the specified work or protective work the drainage authority's access to land drainage infrastructure, flood defences or equipment maintained for flood defence purposes is materially obstructed, the undertaker must provide such alternative means of access that will allow the drainage authority to maintain the land drainage infrastructure, flood defence or use the equipment no less effectively than was possible before the obstruction within 24 hours of or as soon as reasonably practicable after the undertaker becoming aware of such obstruction.*" Negotiations are still ongoing between SHIDB and the Applicant's legal teams re. the wording of the protective provisions.
Q19.0.23	South Holland Internal Drainage Board	**Adoption and maintenance of the drainage system** In the outline Drainage Strategy [APP-227] the applicant states that drainage features would be monitored and maintained according to standard practice and would be regularly inspected and maintained by the contractor and construction personnel. Annex E [APP-232] sets out an	SHIDB considers that the proposed inspection / monitoring and maintenance of drainage features by the contractor and construction personnel are appropriate and reasonable. SHIDB also considers it appropriate that the operational monitoring requirements will be set out – and secured – in the Operational Environmental Management Plan (OEMP). The applicant has not discussed with SHIDB any proposal for the IDB being given responsibility for maintaining any of the Project's SuDS. SHIDB's view is that the Applicant (and subsequently the grantee of the DCO) should remain responsible for the inspection / monitoring and maintenance of the Project's drainage features,

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		'anticipated' inspection and maintenance schedule for the grid connection route strategy. The OOEMP [REP1-063] states that monitoring requirements will be included in the detailed OEMP. Are you satisfied that these proposals meet the requirements of section 5.8 of NPS EN-1 (including paragraph 5.8.39) and that they are sufficient to ensure that there would be no adverse effects on the water environment?	both within the Solar Development Areas and the Grid Connection Route areas. Further, SHIDB would expect the Applicant to commit to restoring any affected land to its pre-construction condition upon decommissioning of drainage features, and where any features are to be retained, a commitment is required that those features will be maintained for their lifetime by the Applicant or landowner.