Response to the Examining Authority's First Written Questions (ExQ1)

From: Cllr Paul Lock, Executive Lincolnshire County Councillor for Economy and Investment – Boston Rural
On behalf of: Residents, farmers, businesses and communities affected by the proposed Meridian Solar Farm

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Burden of Proof Must Rest with the Applicant

I welcome the continued scrutiny being applied by the Examining Authority and the opportunity to submit further observations during this stage of the examination.

At the outset, I wish to make a fundamental point regarding the approach to this examination.

The burden of proof should not fall upon Lincolnshire County Council, parish councils, affected residents, farmers, businesses, or local community groups to repeatedly rebut assertions made by the Applicant. Rather, the burden of proof must remain firmly with the Applicant to positively demonstrate, through objective, independently verifiable evidence, that this development is necessary, justified and capable of proceeding without causing unacceptable harm.

The proposed development would remove significant areas of productive agricultural land from food production for decades. It would industrialise large areas of Lincolnshire's rural landscape, introduce extensive electrical infrastructure into the countryside, affect communities, businesses and landowners, and create long-term uncertainty regarding future land quality and restoration.

It cannot be sufficient for the Applicant to simply state that the project contributes towards national net-zero ambitions and therefore assume that local harms become secondary considerations.

National policy does not remove the need to demonstrate that harm is understood, quantified, mitigated and justified.

The Examination Authority's own questions demonstrate that major concerns remain regarding land use, soils, biodiversity, compulsory acquisition, grid connections, landscape impacts and the overall planning balance. The very existence of these questions indicates that the evidence base is not yet settled and that further justification is required from the Applicant.

Need for Evidence Rather than Assertion

Throughout the examination there has been a tendency, not unique to this project but increasingly common within large-scale solar developments, for developers to rely heavily upon broad statements relating to:

- Net zero targets;
- National energy security;
- Renewable energy generation;
- Biodiversity aspirations;
- Future restoration commitments;
- National policy support.

Whilst these matters are important, they are not evidence.

The Applicant should be required to provide clear, independently verifiable evidence regarding:

- Long-term effects on soil quality;
- Risks associated with piling and ground disturbance;
- Potential contamination pathways;
- Long-term restoration outcomes;
- Agricultural productivity before and after development;
- Effects upon drainage systems and soil structure;
- Food production impacts;
- Food security impacts;
- Local infrastructure impacts;
- Residential amenity impacts;
- Property value impacts;
- Local economic impacts.

The Examination Authority should require evidence rather than assurances.

Agricultural Productivity, Food Security and Economic Value

There is a tendency within energy infrastructure examinations to rigorously quantify electricity generation, carbon savings and megawatt outputs whilst treating food production as a secondary consideration.

This approach is increasingly difficult to justify.

Lincolnshire is one of the most productive agricultural regions in the United Kingdom and makes a nationally significant contribution to domestic food production.

The land proposed for development is not merely open countryside. It is an economic asset producing food, supporting farming families, sustaining agricultural supply chains and contributing to national food security.

Every acre removed from production represents a real economic loss.

Every acre removed from production also represents a reduction in this nation's capacity to feed itself at a time when geopolitical instability, climate pressures, disrupted supply chains and increasing dependence on imports demonstrate the importance of maintaining domestic food production.

The Applicant should therefore be required to provide a comprehensive and transparent assessment quantifying:

- Existing agricultural output from the affected land;
- Gross Value Added generated by that land;
- Employment supported directly and indirectly;
- Contribution to local and national food supply chains;
- Replacement food production assumptions;
- Additional dependence upon imported food;
- Cumulative loss of agricultural production when considered alongside other solar projects proposed across Lincolnshire.

If generation capacity, carbon savings and electricity outputs are presented numerically, then food production losses should be assessed with equal rigour.

Food security should be given equal status to energy security.

Soil Quality, Contamination and Long-Term Land Condition

Particular concern exists regarding the long-term impacts of large-scale solar installations on soil quality and restoration.

Claims that land can simply be restored at the end of a project life must be supported by evidence rather than aspiration.

The Applicant should be required to address growing evidence regarding the vulnerability of soils to degradation, compaction, pollution and loss of productivity.

The Welsh Government-commissioned State of Natural Resources Report 2025: Soil, published by Natural Resources Wales, identifies soil as a resource that can take hundreds or even thousands of years to form and should therefore be treated as effectively non-renewable. The report highlights concerns including soil erosion, compaction, nutrient imbalance, pollution, contamination pathways, declining topsoil carbon within arable land and the impacts of built development and infrastructure upon valuable soil resources.

The report further notes that contaminated land can affect ecosystem function, allow pollutants to migrate into wider environmental systems, create risks to human health and result in significant remediation costs. It also identifies built development and infrastructure as contributing pressures on soil resources and agricultural productivity.

Given this independently prepared evidence, local communities should not be required to prove that harm will occur.

Rather, the Applicant should be required to demonstrate:

- That piling, trenching and associated construction activities will not degrade soil quality;
- That contamination risks have been fully assessed;
- That soil carbon, structure and productive capacity will be maintained;
- That restoration proposals are supported by evidence rather than assumption;
- That independent monitoring will be undertaken throughout the project's lifecycle;
- That enforceable intervention measures exist if degradation occurs;
- That restoration success criteria are measurable and legally enforceable;
- That financial guarantees exist should restoration fail.

The Applicant should also be required to identify who bears liability if restoration objectives are not achieved following decades of industrial use.

The Examination Authority should require evidence rather than assurances.

Impact on Homes, Communities and Property Values

A recurring omission in major infrastructure examinations is the real-world impact experienced by residents.

The focus invariably turns towards megawatts, carbon calculations and national policy objectives, whilst insufficient attention is given to the lived consequences for ordinary people.

Residents frequently experience:

- Loss of rural outlook;
- Reduced enjoyment of their homes;
- Construction disruption lasting years;
- Increased traffic movements;
- Mental stress arising from uncertainty;
- Loss of confidence in local housing markets.

Within my own ward and district there are examples where major infrastructure proposals have been associated with significant valuation impacts and market uncertainty.

I am aware of cases where estate agents and land agents have advised that properties have experienced valuation reductions of approximately 20%. However, I do not intend at this stage to disclose details that could compromise ongoing sales, prejudice individuals or further affect their market position.

The fact that residents are unable or unwilling to publicly disclose sensitive financial details should not result in these concerns being dismissed.

The appropriate response is not to disregard the issue.

The appropriate response is to require the Applicant to demonstrate, through evidence, that such impacts will not occur or to provide a robust assessment of the likely scale, duration and significance of such impacts.

The burden should not fall upon residents to prove financial damage after it has occurred.

The burden should sit with the Applicant to demonstrate that the proposed development will not adversely affect:

- Local property markets;
- Residential mobility;
- Inheritance settlements;
- Divorce proceedings involving asset valuations;
- Lending decisions;
- The ability of residents to realise the value of what is often their principal lifetime asset.

For many families, their home represents the largest financial investment they will ever make. Any risk of financial harm therefore warrants serious consideration within the planning balance.

Lincolnshire's Disproportionate Burden

There is growing concern amongst residents and elected representatives that Lincolnshire is increasingly being expected to accommodate a disproportionate share of the nation's energy infrastructure.

Many communities feel that the county is becoming an acceptable sacrifice zone for nationally significant energy projects because of the availability of farmland and existing grid infrastructure.

The central question remains:

Why should productive Lincolnshire farmland be permanently altered to generate electricity that is not principally required within Lincolnshire itself?

The extensive transmission and grid infrastructure associated with these projects demonstrates that the purpose is largely to export electricity beyond the county rather than to meet local demand.

The benefits are largely national.

The harms are overwhelmingly local.

That imbalance must be properly recognised within the planning balance.

Local communities should not be expected to continuously absorb losses associated with nationally distributed benefits.

Local Democracy and the Planning Balance

There is an increasing perception amongst residents that once the phrases "net zero", "national need" or "energy security" are deployed by developers, local impacts become secondary considerations and local democratic voices become obstacles to be overcome rather than stakeholders to be respected.

This perception risks undermining confidence in the planning system itself.

The purpose of this examination is not to determine whether renewable energy is important.

Most residents accept that it is.

The purpose of this examination is to determine whether **this specific project**, in **this specific location**, on **this specific land**, causing **these specific impacts**, has been justified by evidence.

Invoking national policy objectives should not be treated as a substitute for demonstrating that harms have been avoided, minimised and outweighed.

Nor should broad references to national need provide carte blanche for the overriding of local evidence, local impacts or local democratic concerns.

Conclusion

I respectfully request that the Examining Authority continues to hold the Applicant to the highest evidential standard.

The Applicant should be required to prove:

1. That the development is genuinely necessary.
2. That alternative solutions are less suitable.
3. That agricultural impacts are fully understood.
4. That food security implications have been properly assessed.
5. That soil quality can be maintained and restored.
6. That contamination risks have been fully evaluated.
7. That impacts upon local communities are fully quantified.
8. That local residents will not bear disproportionate financial and social costs.
9. That property market impacts have been properly assessed.
10. That cumulative impacts across Lincolnshire have been fully evaluated.

11. That the claimed benefits demonstrably outweigh the identified harms.

The Applicant should be required to provide evidence disproving or quantifying the risks identified by residents, landowners, local authorities and independent environmental evidence sources. Where uncertainty exists, that uncertainty should weigh against the proposal rather than against those who must live with its consequences.

The planning system must not operate on the basis that simply invoking "national energy need" is sufficient to override local evidence, local democracy and local impacts.

The burden of proof must remain where it belongs:

With the Applicant.

Yours Sincerely

Cllr Paul Lock