PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION BY MERIDIAN SOLAR FARM LIMITED FOR A DEVELOPMENT CONSENT ORDER

RESPONSE TO EXQ1

ON BEHALF OF



NATIONAL GRID ELECTRICITY TRANSMISSION PLC

27 OCTOBER 2026

NATIONAL GRID ELECTRICITY TRANSMISSION PLC ("NGET") RESPONSES TO EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS

Q2.0.8

The applicant has advanced a number of options for the GCR that could occur in Work No. 14 dependent on further discussions with National Grid Electricity Transmission (NGET) as set out in the Connection to the National Grid Weston Marsh Substation Note [REP1-094].

NGET and the applicant: Please provide an update on the ongoing discussions between both parties concerning the alignment and proposed positioning of pylons associated with the Meridian Solar Farm and the Grimsby to Walpole transmission line, with particular reference to the separation distance between the 2 sets of pylons and mitigation measures currently being explored.

NGET: Please provide comments on the options advanced withing the Connection to the National Grid Weston Marsh Substation Note [REP1-094] for Works No. 14.

As set out in NESO's Gate 1 communications, and in line with the outcome of Connections Reform and the arrangements for gated agreements under CUSC section 18, NESO has confirmed to NGET that the Downing Renewables, Holbeach Marsh project has been assigned Gate 1 status.

Considering this, and in line with NGET's regulatory obligations and required processes to follow, NGET will not be progressing further with the works specifically associated with this project, as it is not deemed to be required to support wider connections or other network reinforcements.

This means any additional work Downing Renewables choose to undertake on the Holbeach Marsh project will therefore not be taken forward by NGET at this time.

Given the Meridian Project's Gate 1 status, unless there is a regulatory need to support this, NGET will not be engaging any further with the Applicant at this time.

Q3.0.5

Statement of common ground

At row 3.1.6 of the NGET SoCG [REP1-089], the applicant refers to ongoing design work being undertaken by NGET to further assess the identified pinch point. It is understood that the outcomes of this work have not yet been made available to the applicant. Please confirm whether NGET intends to submit the results of this assessment to the applicant and the examination and, if so, when this information is expected to be provided.

NGET completed its consideration of the outcome of the initial collaborative routing workshop, which took place in July 2025. At that workshop, the project teams identified

a potential solution through the High Road Pinch Point. The applicant is aware that while an option was discussed, it was never agreed and it remained subject to further NGET review and design assurance.

This has identified that the ideal standoff between the two lines is around 92.25m, based on a 55.5m tower height. The anticipated separation between the two schemes is only around 75m, which is approximately 17m below the ideal standoff and around 10m below the 85m figure used in the original assessment. The previously discussed corridor would therefore bring the two lines well inside the approved standoff distance.

Operating inside this distance would leave a residual hazard that NGET's Asset Operations team would be required to accept and manage for the operational life of the asset. On review, we are not in a position to accept it, for the following reasons:

- NGET must be able to safely operate, maintain and de-commission its assets in order to comply with the Electricity Act, SQSS and its operating licence. It cannot accept a design that prevents it from doing so.

- NGET could not be confident that the necessary mitigation measures are deliverable, or that a third party could be held to them over the long term, particularly as Meridian is not a transmission owner and is not licensed on the same terms as NGET.

- The scheme may change hands a number of times over its operational life, so NGET may not always be dealing with Meridian or Downing, and there remain open questions as to the regulatory regime that would apply to their line, including whether SQSS applies.

This was communicated to the applicant on 9th June 2026.

Q3.0.8

Grimsby to Walpole proposed development

NGET: Please confirm when the Grimsby to Walpole application is expected to be submitted and advise what weight the ExA should give the proposal when undertaking the planning balance exercise.

The proposed submission date for the Grimsby to Walpole ("**GtW**") application is summer 2027.

The planning balance exercise must acknowledge the importance of GtW to the UK. The electricity industry in Great Britain is undergoing unprecedented change. The closure of fossil fuel-powered generation and ageing nuclear power stations means substantial investment in sustainable generation and interconnection capacity is required to maintain energy security and supply standards. Growth in onshore renewable technologies, offshore wind generation, and interconnectors with Europe has resulted in many planned connections, particularly in Scotland, England, and along the East Coast.

The UK Government's legally binding "Net Zero" commitment to achieve a 100% reduction in greenhouse gas emissions by 2050 under the Climate Change Act 2008 requires a decisive transition away from fossil fuels. This has driven and will continue to drive investment in low-carbon energy sources.

Historically, the transmission system relied on coal-powered generation, but the shift to low-carbon energy has resulted in the closure of these power stations, with more closures expected. New generation capacity is geographically distant from these historical hubs, requiring substantial updates to the transmission system. Urban areas such as the M62 corridor, the Midlands, and the Southeast have high concentrations of electricity demand. As the UK decarbonises, national energy demand will increase, and fossil fuel generation will be replaced by low-carbon alternatives. The transmission system must be updated to reflect the location of the new generation capacity.

GtW is critical national infrastructure that is required to increase the capability and capacity of the electricity transmission network between the north of England and the MIdlands as part of the Great Grid Upgrade ("**GGU**"). The GGU is the largest overhaul of the electricity grid in generations, and comprises 17, major infrastructure projects that will both scale up the grid and update NGET's existing networks. The GGU is essential for connecting renewable energy generation and achieving the Government's drive to achieve Net Zero by 2050.

NGET's statutory duties under the Electricity Act 1989 require it to develop and maintain an efficient, coordinated and economical transmission system with due regard to amenity. Those duties are operationalised through compliance with the NETS SQSS and by providing sufficient boundary capability to move power from areas of generation to demand. The strategic need and timing for reinforcements are defined by NESO's Electricity Ten Year Statement (ETYS), the Pathway to 2030 Holistic Network Design and its Beyond 2030 follow-up, the Government's Clean Power 2030 mission, and Ofgem's Accelerated Strategic Transmission Investment (ASTI) framework.

ETYS and the Government's Clean Power 2030 both identify that there is a rapid need to reinforce the network and to deploy additional boundary capability through new projects. ETYS also identifies a requirement to accelerate network reinforcement in order to reduce network constraint costs as Great Britain transitions towards clean power.

In Yorkshire and the Humber, NESO's publication Beyond 2030 identifies the need for additional infrastructure to accommodate increasing power flows associated with new offshore wind farms and the wider growth in renewable generation. GtW aims to resolve a capacity deficit across the East Coast generation group whilst increasing boundary capacity across B8 by an additional >6 GW B8 boundary, which was projected in the SOR to have a capability deficit of some 12.3 GW by 2035.

The assessed shortfall at B8 was greater than GtW was able to address on its own, and for this reason, the B8 deficit will be addressed by a combination of GtW, the North Humber to High Marnham ("NHHM") project and other NSIP projects. GtW is a vital element of this solution, delivering an additional >6GW of boundary transfer capability, in addition to maintaining compliance with NETS SQSS to allow the connection of multiple projects in the South Humber to North Wash generation area. These are set out in the SOR and listed below:

Project Name	Type	Capacity (MW)	Connection Year
*GT R4 Windfarm (Outer Dowsing)	Offshore Wind	1500.0 MW	2030
SENECA	Interconnector	1200.0 MW	2031
Mablethorpe Storage	Storage/CCGT	1500.0 MW	2031
Eco Grimsby West	Energy Storage & PV Array	249.0 MW	2031
*Meridien Solar Farm	Energy Storage & PV Array	750.0 MW	2033
*Spalding PV and BESS	Energy Storage & PV Array	480.0 MW	2033
Mablethorpe Green Energy Centre	Energy Storage & PV Array	1025.0 MW	2033
Eco Mablethorpe	Energy Storage & PV Array	249.0 MW	2034
Carbon Free 2030	Energy Storage/Solar	500.0 MW	2034
Stallingborough PV & BESS	Energy Storage/Solar	500.0 MW	2034
East Lincolnshire Solar	Energy Storage/Solar	800.0 MW	2035
Bute Hydrogen Project 3	CCGT & Energy Storage	3600.0MW	2035
Grimsby BESS	Energy Storage	500.0 MW	2035
West Grimsby Farm	PV Array	150.0 MW	2035
Butt Lane	Energy Storage	240.0 MW	2035
Stallingborough Carbon Capture	CCGT	906.0 MW	2035
Total		14,149.0 MW	

In the context of this case, the National Policy Statements (EN-1/EN-5) are directly engaged as both the Meridian Project and GtW are nationally significant infrastructure projects. While both benefit from critical national priority ("**CNP**") designation under the NPSs, the Meridian Project risks prejudicing the delivery of GtW.

EN-1 establishes a presumption in favour of granting such projects unless specific and relevant policies indicate otherwise. This presumption is particularly relevant in this case as GtW is not only nationally significant but also forms part of the Government's critical priority for low-carbon infrastructure. EN-5 further clarifies that this priority extends to new overhead line reinforcements and associated substations, such as those proposed for GtW. If approved without suitable protective provisions in NGET's favour, the Meridian

Project would obstruct a known proposed alignment for a CNP transmission project which is integral to the country's transition to net zero by 2050, and which would provide an additional >6GW (6000MW) capacity to the NETS. In other words, GtW will allow the connection of **eight times** the amount of generating capacity as the total amount provided by the Meridian Project. Indeed, GtW is required to connect the Meridian Project specifically to the NETS. Without the high-voltage electricity transmission line proposed as part of GtW, the electricity transmission system in this area will lack the capacity to accommodate many more new renewable energy sources coming forward before 2035. In these circumstances, it is imperative that necessary protective provisions are included in any DCO granted in respect of the Meridian Project, to ensure that the development does not jeopardise delivery of GtW.

The Government's Clean Power 2030 ambition for at least 95% low-carbon generation by 2030, and NESO's Clean Power 2030 advice, both depend on the timely delivery of projects like GtW. The policy context therefore provides strong and specific support for the need to protect the GtW route from sterilisation or delay by the Meridian Project. Furthermore, GtW's designation as an ASTI project underscores its critical role in meeting the 2030 offshore wind connection targets, qualifying it for accelerated regulatory treatment and imposing specific funding, output and delivery-date obligations. Given the strategic importance of GtW in reinforcing the national grid and supporting the broader energy transition, it is imperative that its delivery is prioritised to ensure compliance with national energy objectives and regulatory frameworks.

As one of the essential components of the GGU, GtW is a critical component of NESO's Clean Power 2030 roadmap. Safeguarding the GtW route is not optional: it is required to meet Government policy, NESO-identified system needs and NGET's licence obligations.

In this case, the National Policy Statement for Electricity Networks Infrastructure (EN-5) is directly relevant because it sets out the assessment principles and policy tests that apply to GtW. EN-5 requires that the need for new transmission infrastructure, such as GtW, be given substantial weight, and that the Secretary of State starts from a presumption in favour of such development. GtW is specifically identified in system planning documents as essential to support the Government's ambition to deploy up to 50GW of offshore wind capacity by 2030 and to deliver the net zero transition. Therefore, EN-5 supports the case for protecting the preferred GtW route through robust protective provisions in the Meridian Project DCO. While the Meridian Project is also nationally significant, the ASTI designation of GtW further reinforces the need for prioritising its delivery by streamlining cost assessment, providing earlier funding access, and imposing a time-based output delivery incentive. This ensures that GtW is delivered on time to meet the 2030 offshore wind targets, which are critical for achieving the Government's net zero objectives. The strategic importance of GtW in enhancing grid capacity and reliability, coupled with its role in facilitating the connection of renewable energy

sources, makes it a cornerstone project that must be safeguarded against any potential conflicts arising from the Meridian Project.

This question has very recently been considered in almost identical circumstances. In the Steeple Renewable Project DCO, decided on 9 October 2026, the ExA concluded that the planning balance favoured protecting NGET's proposed NHHM project. In Steeple, the ExA stated at paragraph 7.5.73 of its recommendation report that *"[i]t is clear to the ExA that the proposed NHHM project is of strategic importance as part of NGET's requirements to improve grid capacity*". The report, at paragraph 7.5.74 went on the state that *"[t]he ExA considers that there is not a legal barrier to providing PPs in relation to future development*." Furthermore, the ExA stated, at paragraph 7.5.76, that *"[o]verall, noting the strategic importance of the NHHM project, the ExA considers that it is entirely sensible for PPs to be attached which would provide a framework for the two projects to coexist during both the construction and operational phases, including mechanisms for consultation, cooperation and dispute resolution*."

In Steeple, ultimately the applicant and NGET reached agreement to regulate the interface between the project and NGET's assets however the principle is clear that the ExA would have accepted NGET's position and secured protection for NGET's future assets.

Q6.1.3

Restriction of Compulsory Acquisition powers

Please provide further detailed justification for the need to restrict CA powers in respect of land required for future projects that is not currently within NGET's ownership. Explain why additional restrictions are considered necessary in respect of the proposed development.

The issue of interaction between the two projects can and should be addressed now by way of protective provisions, within the current examination, for the following reasons.

First, leaving the matter to be resolved through the GtW examination would increase uncertainty for both projects. If protective provisions are not included in the Meridian DCO, the Applicant will need to wait until the conclusion of the GtW examination and the decision on the GtW DCO before knowing whether or how its project will be affected by GtW. In the absence of suitable protective provisions, there would be greater uncertainty for the Applicant, as GtW would need to address the interaction between the two projects through its own DCO application, which will not be determined until after the grant of any DCO in respect of the Meridian Project, leaving the Applicant without clarity as to the interface arrangements between the two schemes during the construction of the Meridian Project. It is far more efficient to resolve the issue now, so that all parties know where they stand.

Second, it is also in the interests of both NGET and the Applicant to ensure co-ordination throughout the development of both schemes so that impacts on the local community can be reduced. A failure to co-ordinate the two projects would likely result in greater and more prolonged disruption for local residents than would be the case if the interface arrangements are resolved now.

Third, deferring the issue to the GtW examination would create consenting risk for, and jeopardise the delivery of, GtW. The Meridian Project proposes a 13 km 400 kV overhead line from the proposed solar farm to Weston Marsh and assumes that the overhead line can be routed through land that will also accommodate the GtW overhead line. NGET's design work has identified that the separation between the two projects is less than the required stand-off distances. The Meridian Project and GtW therefore cannot co-exist as currently designed. These practical implications demonstrate the importance of resolving the interface between the two projects now, rather than deferring the matter to the GtW examination. GtW is critical national infrastructure required to increase the capability and capacity of the electricity transmission network.

There is a real risk that Meridian's CA powers would be exercised over land and rights required for GtW before NGET secures its DCO and land assembly, thereby prejudicing the delivery of GtW's proposed route. Given NGET's duty to develop an efficient, coordinated and economical system, and the advanced stage and essential nature of GtW, the Meridian order must include restrictions preventing the acquisition of land/rights forming part of GtW without NGET consent. That control should extend to temporary possession, rights creation, and the imposition of burdens that would compromise GtW's construction or operation. These controls are proportionate, time-limited by reference to the GtW programme, and consistent with DCO practice.

There is clear precedent for protection of future strategic NGET infrastructure in DCOs, including the Awel y Môr and Mona offshore wind orders, where future substation infrastructure at Bodelwyddan was safeguarded notwithstanding it was not yet built. The Meridian's preferred protective provisions provide protection only for existing assets, existing land ownership and existing access. That approach is inadequate and would enable the Meridian Project to extinguish or frustrate the delivery of a nationally significant reinforcement urgently needed for system compliance and net zero. The Examining Authority should prefer NGET's redline provisions.

Again, this issue was recently considered in the Steeple Renewable Project DCO which concluded that the restriction on CA powers in respect of land required for future projects "*is not unreasonable*" (at paragraph 7.5.76 of the ExA's recommendation report) with the ExA recommending the inclusion of NGET's protective provisions in respect of future assets in the Steeple DCO.