Interested party [redacted]

Please find attached our deadline 3 submissions

We must also declare that AI tools were used to assist with structuring, drafting, referencing and proofreading this submission. The underlying concerns, evidence, questions and conclusions are LAND's own.

ChatGPT/Copilot/Gemini may have been used by various members of the team working on our submissions

Regards

[redacted]

LAND

Meridian Solar Farm comments on Deadline 2 information

Lincolnshire Against Needless Destruction LAND

Application EN010169 | Interested party [redacted]
Previous representation REP1-132

Deadline 3 on 27 October 2026 | Prepared 17 October 2026

Our comments

We remain opposed to Meridian in its present form. We have reviewed the further information on site selection, flood-risk alternatives, water supply and battery safety. It provides useful detail, but important questions remain about the land needed, the connection and the protection offered to local people and the environment.

The case team has confirmed that we can comment at Deadline 3 under the item comments on any further information requested by the ExA and received by deadline 2. These comments sit alongside our ExQ1 response, which covers the related questions and the supporting agricultural and statutory-body evidence. Our sources are listed at the end.

How the scheme grew to 750 MW

The developer's strategic site-selection note says the project began when a landowner offered approximately 260 ha in Parcel D in 2021, potentially supporting around 240 MW. It then secured a 750 MW connection offer and sought approximately 1,000 to 1,200 ha to make use of it. [D1, sections 3.2 and 3.3]

We recognise that willing landowners and connection opportunities influence where projects are proposed. Our concern is that the connection opportunity helped drive a much larger scheme, yet its Gate 2 allocation, connection location and delivery date remain uncertain. We want to know whether a smaller or different connection would change the land needed and the alternatives available.

The search area and the comparison of alternative land need to be explained against realistic connection arrangements. This matters particularly where the developer relies on a 750 MW scheme to justify using land at greater flood risk. We are asking whether that starting assumption remains sound. [D1, sections 4 to 6; D2, section 2.22 and Appendix A response 1.7]

The developer also acknowledges that connecting at Weston Marsh A could require up to approximately 4 km of additional connection, through a DCO variation or further consents. This is a possible outcome, not an agreed route. However, we want the implications for land, communities and the construction programme clearly explained, along with which arrangements the present application covers. [D2, section 2.22.9]

Why develop in the higher flood zones

We recognise the changes made to avoid some flood risk, including moving substation infrastructure and using some higher-risk areas for habitat. However, document 8.36 still proposes solar infrastructure in Flood Zones 3a and 3b, including six indicative solar stations associated with Parcel D. [D3, section 5]

The developer says removing affected land or changing the layout would reduce generation and viability. We want to see the figures behind that claim: what could be avoided or moved, how much capacity and annual generation would be lost, and why the resulting scheme would not be viable. The preferred size of the project does not, on its own, explain why higher-risk development is necessary.

We also want to know how structures, stockpiles and construction works could affect floodwater and whether they could increase risk elsewhere. The Environment Agency has agreed the River Welland modelling approach, but questions remain about the Postland and South Holland Main Drain catchments and climate-change assumptions. Those outstanding matters need to be resolved. [D4, flood-risk items; see also ExQ1 Q19.0.7 to Q19.0.11]

Keeping workers safe is another important concern. The ExA's questions ask how evacuation and refuge would work, including where people would be, how long they would have and how many could use each refuge. We want these arrangements demonstrated before they are relied upon. Any assumption that fewer staff would be present in bad weather needs to be backed by clear rules. We cover this in more detail in our ExQ1 response.

Water figures that need checking

The Water Supply Strategy estimates typical construction demand of 51.3 m3 a day, excluding landscape irrigation, and a peak of about 269 m3 a day. It identifies possible supplies from commercial tankers, a mains connection subject to agreement and licence trading subject to approval. This helps explain the options, but some of the figures need correcting or clarifying. [D5, sections 2.4 and 3]

1. Table B2 uses 855 workers and 55 litres per worker per day, but gives peak drinking and welfare water demand as 42.75 m3 a day. Multiplying the stated inputs gives 47.025 m3 a day. The reported figure corresponds to 50 litres per worker. We ask which allowance is intended and whether the totals need updating. [D5, Appendix B, Table B2]

2. Paragraph 2.2.2 also appears to contain a decimal or unit error when compared with the 55-litre assumption and Appendix B. We ask that the units and calculations are made consistent throughout. [D5, section 2.2]

3. The 28 September meeting minutes record a possible landscape-watering peak of about 438 m3 a day, while Table B2 gives 212.9 m3 a day. These may reflect changed assumptions, but we need an explanation of the difference and confirmation of the figure used for supply and traffic assessments. [D5, Appendix A, meeting item 4; Appendix B, Table B2]

We are not suggesting these discrepancies prove that water cannot be supplied. We want reliable figures because they affect tanker traffic, supply arrangements and whether the planting intended to screen the development can be successfully established.

Water tankers and local roads

The strategy describes two to three tanker deliveries a day against typical construction demand and says these have been considered in the traffic assessment. If the stated peak of 269 m3 a day were supplied entirely by 30 m3 tankers on that day, it would need approximately nine loaded deliveries, plus departures. Actual movements would depend on storage, tanker sizes, delivery timing and other supplies. [D5, section 3.3]

We ask the developer to show how peak demand would be met and whether the traffic assessment covers that arrangement alongside other construction activity. Local roads could experience concentrated deliveries even where the annual average looks modest. We want to understand the busiest relevant periods, the routes used and the storage available.

The strategy says most landscape watering would follow other construction works. We have therefore not added every peak together. We ask for a programme showing the expected separation and any overlap, including during dry conditions. There also needs to be a clear response if the intended water supply is unavailable, so that communities and the success of the landscape planting are protected. [D5, sections 2.4 and 3]

Trading an existing irrigation licence is another option being considered, subject to approval. Where the developer relies on a return to productive farming after decommissioning, we want to know what this could mean for irrigation at that point. Restoring the soil alone would not restore equivalent production if the necessary water access had been lost. [D5, section 3.4; D6, irrigation and restoration comments]

The revised battery safety plan

We welcome the safeguards in the revised plan: at least 360 m3 of firefighting water storage, automatic drainage isolation with manual backup, an impermeable battery compound and arrangements to test and remove potentially contaminated water. These are important commitments, and our remaining concerns take account of them. [D7, sections 4.3 and 4.5]

We want the firewater containment calculation to be clearly understood. It compares full firefighting water plus a 1-in-2-year storm with a 1-in-100-year storm plus 40 per cent climate-change allowance on its own, using whichever requires more storage. It does not demonstrate full firefighting water and the 1-in-100-year storm together. We ask the relevant authorities to confirm that these scenarios are adequate, including how any additional water for internal suppression would be contained. [D7, paragraphs 4.5.6 and 4.5.9]

The final battery technology, testing and detailed smoke-plume analysis would follow at the design stage. The plan proposes further analysis for sensitive receptors within 1 km. We want clear limits on the design that can be approved and a clear process if the final work shows that

major changes are needed to the layout, separation distances, drainage or other safeguards. [D7, section 5]

We welcome the ExA's request for Lincolnshire Fire and Rescue Service to confirm whether it has reviewed and accepts the revised plan. We also want the Environment Agency's current position on pollution controls and firewater. We are asking for those answers, rather than assuming either body has rejected the plan. [D4, battery and water-quality items; ExQ1 Q20.0.12 and Q20.0.13]

What still needs to be settled

The further information has helped us understand the proposals, but it does not settle the connection, the reasons for higher-risk floodplain development or the detailed water and safety arrangements. These questions matter to the people living and working around the scheme.

We ask for one clear list of what must be resolved before the decision, what can safely be approved later and what would need a change to the application or further consent. For later approvals, we want to know who decides, who is consulted, what standards apply and who checks that the commitments are met. This is why we support the ExA's challenge to the wording substantially in accordance with. [D8, Q7.3.1]

We do not think communities and landowners should be expected to accept major impacts on the strength of unresolved assumptions. The claimed benefits need to be weighed against the harms using reliable evidence. If the essential connection, environmental safeguards or case for compulsory acquisition cannot be properly justified when the decision is made, we ask the ExA to recommend refusal.

Sources

D1 Meridian document 8.35 Post ISH1 Note Strategic Site Selection October 2026 EN010169-000700.

D2 Meridian document 8.32 Applicant's Comments on Written Representations October 2026 EN010169-000682.

D3 Meridian document 8.36 Post ISH1 Note Sequential and Exception Tests October 2026 EN010169-000696.

D4 Meridian document 8.12 Statement of Common Ground with Environment Agency Revision 1 tracked October 2026 EN010169-000694. Status descriptions concern that revision and should be read with the expert responses requested in ExQ1.

D5 Meridian document 8.37 Water Supply Strategy October 2026 EN010169-000697.

D6 Reading Agricultural Consultants Soils Agriculture and Land Use review October 2026 LCC Appendix 2 EN010169-000676.

D7 Meridian document 7.18 Outline Battery Safety Management Plan Revision 1 tracked October 2026 EN010169-000690. References concern revised provisions and not deleted wording.

D8 Examining Authority First Written Questions issued 13 October 2026 EN010169-000715 Word version and EN010169-000716 PDF version.