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 responses to the first written questions

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 response

We remain opposed to Meridian in its present form. We are concerned about the loss of productive farmland, the effects on local communities and the uncertainty over how and when the scheme could connect to the grid. These are substantial issues, and we want them resolved before consent or compulsory acquisition powers are granted.

We have focused on the ExA questions that relate to our concerns and the evidence we have reviewed. Some are directed to the developer or specialist bodies. Our comments explain what we think is still missing and why it matters to the communities we represent. We have also provided separate comments on the further information submitted at Deadline 2. Our sources are listed at the end.

Updated planning policy

Q1.0.4. Our concerns about farmland, flooding, landscape, cumulative impacts and the grid connection remain. We are not putting forward a separate interpretation of the updated NPPF here. We ask that the decision takes account of the evidence set out below, including any corrections to the developer's assessments, and that any change to its policy case is clearly explained during the examination.

Gate 2 and the connection programme

Q.3.0.1, Q.3.0.2, Q.3.0.3, Q.3.0.4 and Q.3.0.7. The developer says it intends to apply again for Gate 2 as NESO confirms further regional capacity. That leaves us without a confirmed allocation, connection location or date. We welcome the ExA's questions about why Meridian received Gate 1, which criteria it did not meet and when another application could be made. We need evidence behind the developer's confidence that it will succeed next time. [S1, Appendix A, response 1.7]

Our concern goes beyond the Gate 2 label. Capacity, the physical connection and the programme are all uncertain. We want the developer to explain how it can meet the connection policy identified in Q.3.0.7 while these issues remain unresolved. An expectation that matters will work out later is not enough reassurance for the people affected.

Q.3.0.8 and Q.3.0.9. We ask for a clear explanation of how the proposed construction and generation dates fit with Meridian's Gate 1 position and the infrastructure it depends on. The

developer's intention to wait before making a final investment decision does not provide the same protection as a binding restriction on starting work. We want to know what must be settled first, when that is expected and what happens if the connection is delayed or changes. [S1, Appendix A, response 1.7; S2, p. 2]

Connection design and alternative locations

Q.3.0.5, Q.3.0.6, Q5.0.1, Q5.0.2 and Q5.0.3. We want to see the pinch-point assessment published, together with a clear account of what National Grid Electricity Transmission and the developer agree and where they still differ. Local people need a joined-up plan showing how Meridian, Grimsby to Walpole and WMEL would fit together, including the space needed to build, operate and maintain them safely.

The developer acknowledges that connecting at Weston Marsh A instead of B could require up to approximately 4 km of additional connection and a DCO variation or further consents. This is a possibility, not an agreed route, but it could mean more land and more impacts. We ask for those implications to be explained now, including which connection arrangements the current application actually covers. [S1, section 2.22.9]

We also welcome the question about undergrounding. Where the overhead route creates conflicts or significant harm, we want a proper comparison of the available options, including their effects on homes and the landscape as well as technical constraints.

Why this scale and this land

Q1.0.10, Q4.0.1 and Q5.0.4. The general need for solar does not explain why Meridian needs this much land. The developer's own account starts with a landowner offering about 260 ha, potentially supporting around 240 MW. The later 750 MW connection opportunity led to a search for approximately 1,000 to 1,200 ha. The connection opportunity clearly helped determine the scale of the scheme. [S3, sections 3.2 and 3.3]

We want the Statement of Need to explain the difference between installed panel capacity, grid export capacity and the electricity expected across the year, including winter. We also want to know how much extra land is needed for overplanting and what quality that land is. If the eventual connection is smaller or later than expected, the case for the proposed scale and land take needs to be tested again. We recognise that land availability matters, but it cannot answer all of these questions.

Starting work and compulsory acquisition

Q7.3.3. We support Lincolnshire County Council's request to prevent work starting until the Weston Marsh connection is secured. We also want a clear explanation of why Meridian needs seven years to commence rather than the more usual five. Giving the developer longer does not resolve the uncertainty. Any restriction needs to cover preparatory works that could cause the harm it is meant to prevent, with any exceptions clearly explained and limited. [S2, p. 2]

Q6.0.3, Q6.0.8, Q6.0.9, Q6.0.12, Q6.0.14 and Q6.0.15. Compulsory acquisition has serious consequences for the people whose land and rights are affected. We want the developer to

explain, plot by plot, what it needs, what alternatives it considered and how it has weighed the claimed public benefit against the loss to those people. It should not retain powers over land for options it has discarded. The uncertainty over delivery and alternative connections must form part of that explanation.

Farmland quality and production

Q14.0.1, Q14.0.2 and Q14.0.11. We need a reliable picture of the farming affected, including tenants and holdings along the connection and inter-array routes. What a farmer currently grows is different from what the land is capable of producing. Feed crops are part of the food chain, and present cropping choices do not make good agricultural land less valuable.

RAC's Deadline 2 report raises a specific concern about 157.83 ha described as meeting Grade 3a criteria but grouped with Grade 3b land. This is a disputed technical issue which needs an answer. Natural England also continues to question the mapping and supporting soil evidence. We ask for the differences to be resolved, the unsurveyed areas to be clearly identified and any resulting change to the farmland figures to be reflected in the decision. [S4, report p. 8; S5, BMV5.1, BMV6, BMV7 and BMV10]

We recognise that Natural England accepts the use of predictive evidence where genuine access problems prevent surveys, provided the remaining work is secured. Our concern is whether any uncertainty could change the case for using this land. That needs to be understood before the decision is made. [S5, BMV4 to BMV10]

Q14.0.4, Q14.0.6, Q14.0.7, Q14.0.13 and Q14.0.15. A promise to restore the land needs clear starting records, recovery standards and timescales, with responsibility for repairing drainage and compaction. We welcome the improved treatment of permanent losses beneath hardstanding. However, Natural England still disputes the reduced impact assigned to approximately 19.1 ha of Best and Most Versatile land permanently converted to tree and shrub planting. We agree that the agricultural loss must be counted properly, even where planting brings other benefits. [S5, BMV11 and BMV12]

Sheep grazing and farming jobs

Q17.0.3 and Q17.0.4. The developer's reply to us confirms that sheep grazing is optional and is not relied upon as mitigation in the Environmental Statement. It also says a detailed grazing strategy would be premature. We therefore cannot accept the grassland area as evidence that livestock farming will continue across it. [S1, Appendix A, responses 1.3 to 1.5]

If grazing is to be presented as a farming or employment benefit, we want to see what that would mean in practice: the usable area, who would supply and manage the sheep, water, handling facilities and welfare arrangements. There also needs to be a commitment to deliver it. Showing that sheep can graze at some solar farms does not establish what will happen at Meridian.

Q17.0.2, Q17.0.6 and Q17.0.7. The developer has explained how 10 direct operational jobs become 11 net jobs when indirect and induced effects are included, with five in its defined local study area. Our remaining concern is its assumption of zero existing agricultural employment. It

says contractors are not wholly reliant on this land, but losing part of their work could still affect their livelihoods. [S1, Appendix A, response 1.6]

We ask for a proportionate check of how allowing for existing farm work and agricultural supply-chain activity would change the claimed employment benefit. Crop sales are not the same as net economic loss, but the work and production being displaced still need to be properly considered.

Birds and protected habitats

Q11.0.5, Q11.0.6 and Q11.0.15. Natural England says further consideration of habitat loss and disturbance is needed before it can be concluded that there would be no adverse effect on site integrity. This includes land outside the protected sites which supports their birds, described as functionally linked land. We welcome the requests for maps and clarity about the sites, species and project phases affected. [S5, NE5 to NE8 and NE18; S11, annex A]

We want these concerns resolved through the specialist evidence and any necessary protection firmly secured. The ExA's questions are not conclusions, but they identify matters that still need answers before a decision can be made.

Combined impacts on communities

Q1.0.5, Q.3.0.8, Q15.0.26 and Q17.0.5. Our communities will experience these projects together. We want the cumulative assessment to show which schemes have been included and how their construction programmes could overlap. LCC has raised possible competition for accommodation. We ask that this is checked against realistic travel times, seasonal visitor demand and the needs of existing tourism businesses. Separate project workforce peaks should only be combined where they could actually coincide. [S2, pp. 8 to 9]

We support the detailed assessment of views from homes requested in Q15.0.26, particularly along the connection route and where several schemes would be seen together. AAH's review also questions the treatment of homes, overhead lines and mitigation in this corridor. The effect on people's outlook needs to be examined property by property where appropriate, rather than answered only through general landscape conclusions. [S6, pp. 1 to 3]

Flood risk and keeping workers safe

Q19.0.7, Q19.0.8, Q19.0.10 and Q19.0.11. We recognise that the developer has changed parts of the design to avoid flood risk. However, panels and solar stations remain proposed in higher-risk areas. We want figures showing what could be avoided, moved or reduced, how much generation would be lost and why that would make the scheme unviable. That explanation needs to be linked to the case for 750 MW. [S7, section 5]

The Environment Agency has agreed the River Welland modelling approach, while questions remain over other catchments and climate-change assumptions. We ask for those outstanding matters to be resolved, including the effects of catchments flooding at the same time and any increased risk elsewhere. [S8; S11, Q19.0.7 to Q19.0.10]

Q19.0.17, Q19.0.18, Q19.0.19 and Q19.0.20. The ExA questions identify up to 855 construction workers and illustrative refuge capacity for 368 if all 23 compounds are available. We understand that warnings and evacuation could reduce the number needing refuge. We still need a convincing explanation of how everyone would be kept safe, including where they would be working, how quickly flooding could arrive and whether escape routes would remain usable. Any reliance on reduced staffing must be backed by clear rules. The same care is needed during operational replacement works. [S11]

Water and battery safety

Q19.0.1. Our separate comments identify discrepancies in the Water Supply Strategy and ask for the peak supply and tanker assumptions to be checked. Possible suppliers have been identified. We want confirmation that the proposed arrangements are workable, their impacts have been assessed and Anglian Water and the Environment Agency are satisfied with the matters relevant to them. [S9, sections 2 and 3 and Appendix B]

Q20.0.12 and Q20.0.13. We welcome the safeguards added to the revised battery plan, including at least 360 m3 of firefighting water storage and measures to contain polluted water. We now want Lincolnshire Fire and Rescue Service's response and clarity about ongoing monitoring and how it would be funded. Final battery selection, fire testing and smoke-plume analysis must stay within what has been assessed, with a clear process if they reveal a need for major changes. [S10, sections 4.3, 4.5 and 5]

What we are asking for

Q7.3.1. We support clear, binding requirements and the ExA's challenge to the wording substantially in accordance with. People need to know what protection they can rely on. Later management plans can deal with detail, but they should not be used to leave fundamental questions about the scheme unanswered.

We ask for one clear list showing 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, it should say who decides, who is consulted, what standards apply and who checks compliance.

We want the outstanding evidence provided and the benefits and harms weighed on that basis. If the connection, environmental protections or case for compulsory acquisition still cannot be properly justified when the decision is made, we ask the ExA to recommend refusal.

Sources

S1 Meridian document 8.32 Applicant's Comments on Written Representations October 2026 EN010169-000682. Particular references are section 2.22 and Appendix A responses to LAND REP1-132.

S2 Lincolnshire County Council Deadline 2 Response dated 6 October 2026 EN010169-000678.

S3 Meridian document 8.35 Post ISH1 Note Strategic Site Selection October 2026 EN010169-000700.

S4 Reading Agricultural Consultants Soils Agriculture and Land Use review October 2026 LCC Appendix 2 EN010169-000676. Page 8 refers to the report's printed pagination.

S5 Natural England Deadline 2 Response dated 6 October 2026 EN010169-000680. Issue identifiers are used to locate the advice.

S6 AAH Consultants Technical Memorandum 8 October 2026 LCC Appendix 1 EN010169-000677.

S7 Meridian document 8.36 Post ISH1 Note Sequential and Exception Tests October 2026 EN010169-000696.

S8 Meridian document 8.12 Statement of Common Ground with Environment Agency Revision 1 tracked October 2026 EN010169-000694.

S9 Meridian document 8.37 Water Supply Strategy October 2026 EN010169-000697.

S10 Meridian document 7.18 Outline Battery Safety Management Plan Revision 1 tracked October 2026 EN010169-000690. References concern the revised provisions and not deleted wording.

S11 Examining Authority First Written Questions issued 13 October 2026 EN010169-000715 Word version and EN010169-000716 PDF version.