

Relevant Representation of National Grid Electricity Transmission Plc in respect of the Helios Renewable Energy Project (the “Project”)

Introduction

This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc (“NGET”) in respect of the Project, and in particular NGET’s infrastructure and land which is within or in close proximity to the proposed Order Limits.

NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.

NGET’s rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.

Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET’s interests in land or NGET’s apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights.

NGET infrastructure within/in close proximity to the proposed Order Limits

NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales.

The details of the electricity assets are as follows:

- Drax1 132kV substation
- Camblesforth 66kV substation
- 4VJ 400kV OHL – Drax - Eggborough 1;
- Drax – Eggborough 2
- 4VH 400kV OHL – Drax – Keadby – Thorpe Marsh;
- Drax – Thorpe Marsh
- Camblesforth to Drax 66kV underground cable.
- Associated fibre cables

Protection of NGET Assets

As a responsible statutory undertaker, NGET’s primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.

As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits.

As noted, NGET’s rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.

NGET will require protective provisions to be included within the draft Development Consent Order (the “Order”) for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards.

NGET is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required.

NGET requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant’s works pursuant to the Order (if made) will ensure protection for those NGET assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations.

NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.

Compulsory Acquisition Powers in respect of the Project

The Applicant is seeking compulsory powers over plots 68 and 69 which forms part of NGET’s substation at Drax. NGET objects to the compulsory acquisition of its assets, land or rights over its land in the absence of an agreed form of Protective Provisions. It is essential that nothing contained within the Order prevents NGET from continuing to deliver future plans or from accommodating other electricity connection customers to meet its statutory obligations.

Furthermore, the Applicant is seeking compulsory powers over a number of plots which include NGET overhead line assets, access rights and/or interests . As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGET’s interests in land, NGET will require further discussion with the Applicant and NGET will require its standard Protective Provisions to be included within the Order

NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.

NGET New Infrastructure

NGET is promoting the Eastern Green Link 2 project (EGL2). EGL2 is a 2GW electricity transmission to connect the transmission systems of Scotland and England. It is a nationally significant project which benefits from consent and regulatory approval. There is an urgent need for EGL2 as part of the decarbonisation of the electricity grid and, in particular, in the context of the target of 50GW of offshore wind energy by 2030.

NGET was granted planning permission from East Riding of Yorkshire Council (application reference 22/01990/STPLFE) on 3 March 2023 (the ERYC Permission) and was granted planning permission from North Yorkshire Council (with application reference 2022/0711/EIA) on 11 August 2023 (the NYC Permission) for the development of the onshore components for EGL2. These comprise approximately 68km of underground High Voltage Direct Current (HVDC) cables from Fraisthorpe to Drax, a converter station located off New Road at Drax and underground High Voltage Alternating Current (HVAC) cables between the converter station and Drax 400kV Substation as well as associated temporary works to facilitate construction.

It is expected that construction of the onshore components will be undertaken between 2024 and 2029. NGET is currently seeking voluntary land rights in respect of the EGL2 project and made The National

Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 on 5 September 2023 (the CPO). A decision on the confirmation of the CPO is expected shortly.

The interaction between the Project and EGL 2 relates to Work No. 5 (Grid Connection Cable Corridor) and plots 62, 66, 68 and 69 as shown on the Land Plan and described in the Book of Reference. It is proposed that new rights will be acquired by the Project over plot 62 (New Road) and also over plots 66, 68 and 69 (land surrounding the substation). This land is required as part of the EGL2 project in relation to access and the proposed AC connection corridor.

NGET will require its ordinary protective provisions to apply in respect of EGL2. In order to avoid serious detriment to NGET and its undertaking, the Applicant must not be granted powers of acquisition or temporary possession in respect of any land required for EGL2. It is not considered necessary to the Applicant to acquire rights over plot 62 given that this plot consists of public highway.