

## **Relevant Representation of National Grid Electricity Transmission Plc in respect of the East Yorkshire Solar Farm DCO (the "Project")**

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:

- 4VC 400kV OHL and associated cable fibre
- Drax Substation 400kV/132kV

### **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 plot 22/172 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.

Furthermore, the Applicant is seeking compulsory powers over a number of plots which include NGET overhead line assets 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.

## Connections

The Applicant's Grid Connection Statement states that NGET has confirmed a spare bay within the existing National Grid Drax Substation. At present NGET is unable to confirm the connection location for the East Yorkshire Solar Farm project until it has undertaken further site reviews.

## 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. 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. Subject to planning permission being granted 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**).

NGET has engaged with the Applicant at the pre-application stage and has submitted consultation responses to make it clear to the Applicant that the Applicant must have regard to the onshore components of EGL2 in developing its scheme, and that it would need to fully consider EGL2 as part of the cumulative assessment of your Environmental Impact Assessment (EIA) and its outline design principles statement.

In spite of this engagement, the Project still overlaps with the land required for EGL2 in a number of areas. The plans appended to this representation (ref: J002384-24-01, Sheet 1 of 3, Sheet 2 of 3 and Sheet 3 of 3) show the extent of EGL2 (edged red) and the extent of the Project (edged blue). This demonstrates the interaction between the Project and EGL2 and the continued overlap.

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 in respect of any land required for EGL2.

In order to protect EGL2, the DCO for the Project and the Outline Design Principles Statement must make it clear that:

- no part of the ground mounted solar photovoltaic generating station or any associated works can be located in an area marked for EGL2; and
- no part of the grid connection for the Project can be located in the area marked for EGL2. This is particularly important given that the Applicant seeks broad powers of compulsory acquisition over an area of land consented for the converter station for EGL2.

### ***Land Position for EGL2***

NGET is now the freehold owner of Plot 22/165 as shown on the Applicant's Land Plans. Plot 22/165 is required for the construction of the converter station as part of EGL2, and the associated HVAC cable connection to connect to the Drax substation. The Project's Grid Connection interacts with the location of the EGL2 converter station where it is routed along New Road. NGET has drawn the Applicant's attention to this matter during the pre-application stages of the Project.

The Applicant has not sought to acquire these rights through negotiation with NGET and given the availability of a route for the grid connection in the adjacent street there is no compelling case in the public interest for the acquisition of these rights over NGET's land.

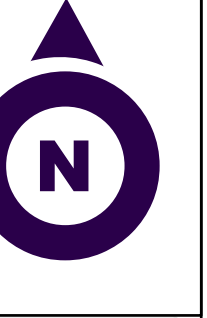
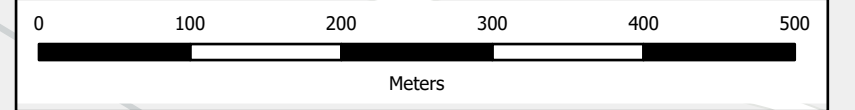
Through CPO for EGL2, NGET is also seeking the acquisition of rights over parts of:

- Plot 22/151 and Plot 22/167 to deliver the HVAC cable connection required to connect EGL2 to the Drax substation; and
- Plot 22/155, 22/156 and 22/159 in order to access the converter station.

Given NGET's landholdings and the interaction with EGL2, NGET's position is that the Order should be amended so that the grid connection cable infrastructure is limited to installation in New Road at Plot 22/170. NGET's understanding is that this is where the grid connection cable infrastructure would be installed in any event.

The Applicant must not be permitted to acquire or extinguish the rights of NGET in respect of these parcels of land. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with EGL2.

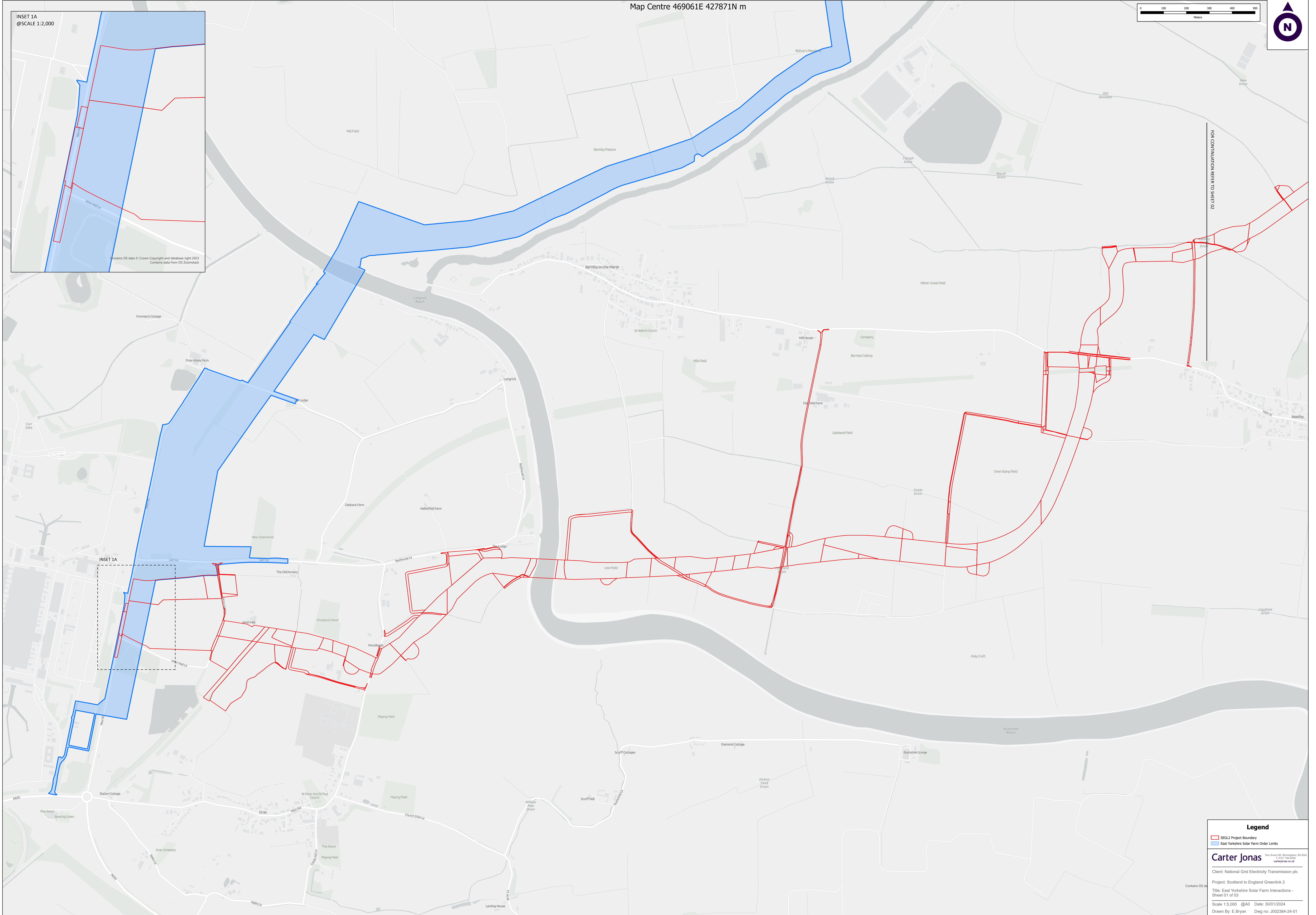
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**INSET 1A**  
@SCALE 1:2,000

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FOR CONTINUATION REFER TO SHEET 02



**Legend**

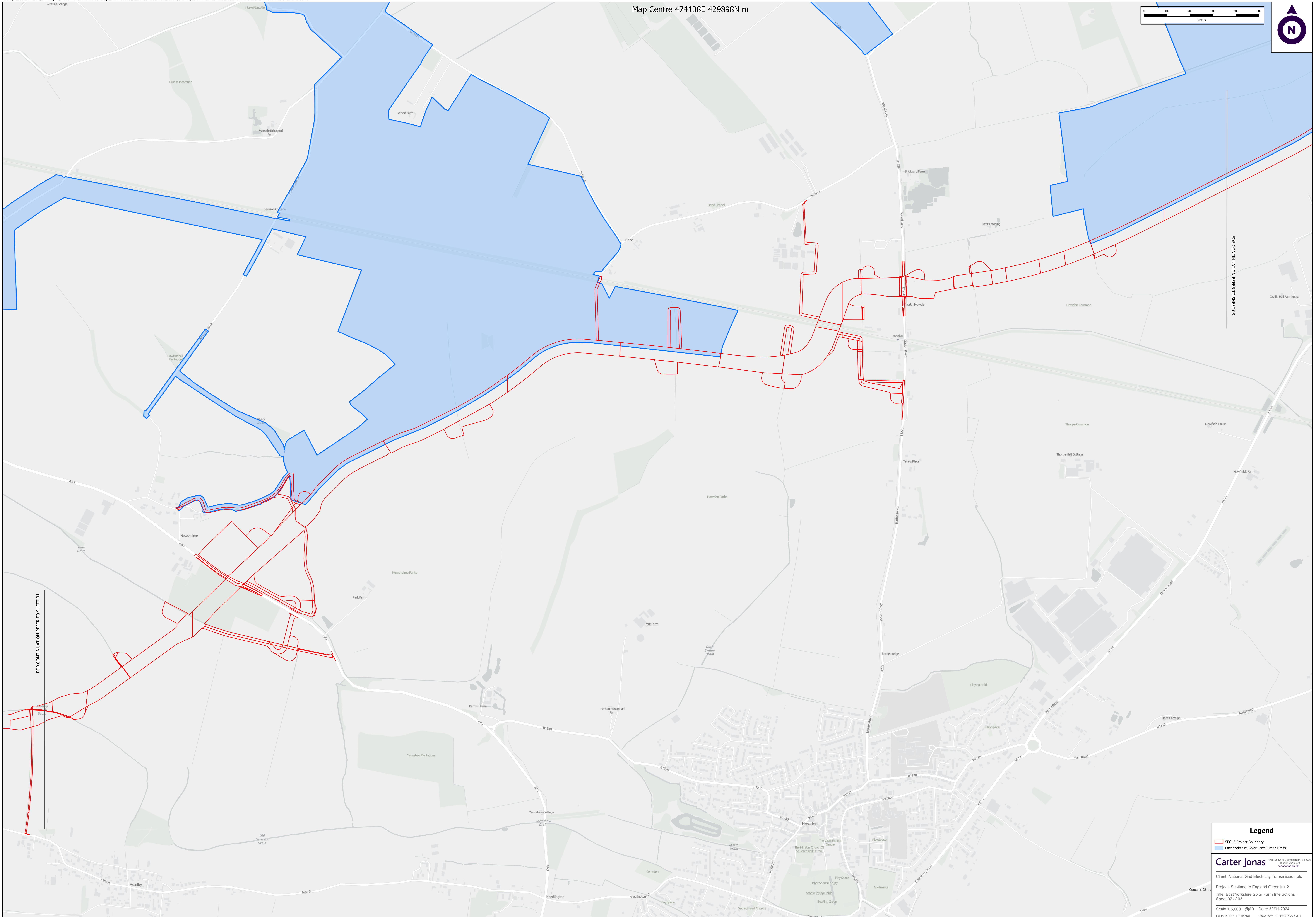
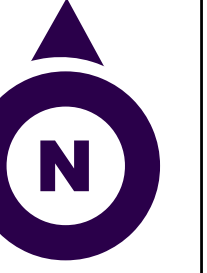
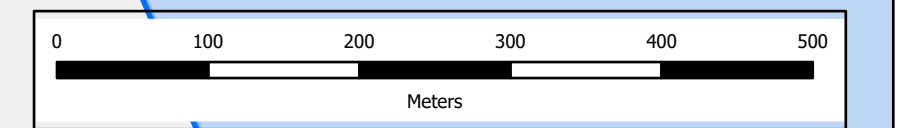
- SEGL2 Project Boundary
- East Yorkshire Solar Farm Order Limits

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Client: National Grid Electricity Transmission plc

Project: Scotland to England Greenlink 2  
Title: East Yorkshire Solar Farm Interactions - Sheet 01 of 03  
Scale 1:5,000 @A0 Date: 30/01/2024  
Drawn By: E.Bryan Dwg no: J002384-24-01

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FOR CONTINUATION REFER TO SHEET 03

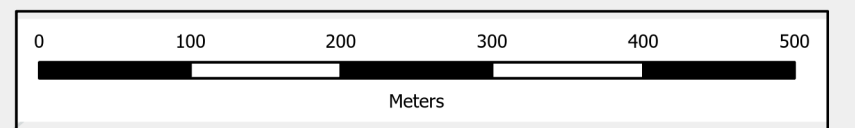
**Legend**

- SEG2 Project Boundary
- East Yorkshire Solar Farm Order Limits

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FOR CONTINUATION REFER TO SHEET 02

**Legend**

- SEGL2 Project Boundary
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