

Dear Sirs,

This constitutes the written representations of National Grid Electricity Transmission Plc (NGET) to the A19 / A184 Testos Junction Improvement Project (Reference *TR010020*) and should be read in conjunction with and in addition to our earlier submitted relevant representation dated 05<sup>th</sup> October 2017.

Since those representations, NGET has also agreed a statement of common ground ("SoCG") with Highways England which further reflect NGET's current position and explains the relatively short nature of this additional representation.

The relevant representation explains that NGET has land holding and existing assets and interests located within, or in close proximity to, the Order limits that are affected by the Project. The nature and relevance of these interests is explained in the SoCG.

The land owned by NGET upon which the two sub stations are situated is operational land and NGET objects to any unfettered rights of compulsory acquisition sought over this land. It is acknowledged that the permanent powers sought in the Order are limited to the acquisition and creation of new rights over this land but these must be protected to ensure the safe operation of the sub stations. The draft Order also includes operational land to be used temporarily and again, for safety and operational reasons, NGET objects to any unfettered use of these areas.

However, as recorded in the SoCG, NGET has now been provided with sufficient information by Highways England for NGET to confirm that it does not object to the principle of the permanent and temporary interference subject to application of protective provisions in favour of and in form acceptable to NGET. As is typical, these protective provisions should dis-apply the general application of the compulsory acquisition and temporary rights in the DCO and require Highways England to submit detailed design to NGET for approval. Highways England will be required to regularise any changes to the land arrangements under the terms of the protective provisions and in line with the approved details.

The SoCG also records that NGET -owns other land surrounding the above two substations and has spent a large amount of time and money along with Groundworks, who lease the land, to develop an environmental education centre. This is an important site for NGET, for providing environmental education to the surrounding communities and there are some key habitats with notable flora and fauna including orchids, adders tongue ferns, dormice and a wide variety of bird and bat species in the locality. Whilst this land is not in operational use by NGET at this time, NGET places a high value on it in delivering its other corporate functions relating to social responsibility and therefore needs to understand and approve the detailed proposals for it before works commence. NGET does not object to the principal of permanent acquisition of the area required for the widening of the Testos junction. However, NGET expects the process of approval required under the protective provisions process to also apply to this area such that detailed design is submitted to NGET for approval. NGET is seeking confirmation of these arrangements with Highways England, which may result in some changes to the draft DCO, once agreed. At this time, NGET understands that the principal matter will be details of appropriate fencing to be provided as part of the works to provide safe barrier to the permanent land that is required for the widening.

The protective provisions that are currently included within the draft Order for the benefit of electricity, gas, water and sewage undertakers are not agreed by NGET at this time. NGET is in dialogue with Highways England and is currently optimistic that resolution can be reached in the near future.

In the event on no final agreement being reached, NGET reserves its right to submit to the Examining Authority its preferred form of wording and justification for its required form of protective provisions and any other changes to the draft Order.

Should negotiations with the Applicant fail to achieve agreement on the necessary protections, National Grid will wish to attend and speak at issue specific hearing(s) on the draft Order or may render residual concerns to further writing nearer the time.

Furthermore and in an abundance of caution, National Grid wishes to reserve its right to attend and speak at the compulsory acquisition hearing(s) unless it has been possible to resolve its concerns over the acquisition of and interference with rights with the Applicant.