

**BOTLEY WEST SOLAR FARM (the Project)**  
**DEADLINE 1 (4 June 2025)**  
**NATIONAL GRID ELECTRICITY TRANSMISSION PLC**  
**WRITTEN REPRESENTATION**

*Introduction*

1. National Grid Electricity Transmission plc (“NGET”) is a statutory undertaker for the purposes of the Planning Act 2008.
2. As part of the Project, the Applicant proposes to construct a solar farm connecting into a proposed NGET substation called Farmoor substation. The Applicant is seeking temporary and permanent rights over several plots owned by, or containing, NGET rights and assets including those shown on sheet 13 of the Land Plans and referenced in the draft DCO as Works Number 1, 2, 5, 6 and 9. The Applicant is also seeking rights over parcel 13-04 which may be required for the NGET proposed Farmoor substation.
3. As a responsible statutory undertaker, NGET’s primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. 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. Additionally, NGET must protect the ability to deliver, operate and maintain its future proposed infrastructure.

*Existing Assets Impacted*

4. NGET owns and operates the following assets that are located within and in close proximity to the 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 impacted are as follows:
  - (a) Overhead Lines:
    - (i) 4TE 400kV OHL – Cowley – Walham
    - (ii) Cowley - Minety
  - (b) Associated overhead and underground apparatus including cables

*Future Assets and Proposed Substation*

5. NGET has identified a direct interface between the Project and a NGET infrastructure project. These proposals are part of NGET’s Great Grid Upgrade – the largest overhaul of the grid in generations. NGET infrastructure projects across England and Wales are connecting additional renewable energy to homes and businesses.
6. National Grid has a licence obligation to provide connections to the electricity transmission network across England and Wales. This licence obligation to offer connections is set by the energy regulator, Ofgem.
7. As the Examining Authority is aware, NGET are proposing to construction a new substation in the vicinity of the Order limits -the NGET Farmoor Substation.
8. The NGET Farmoor substation is a proposed new substation, on a site just south of Farmoor Reservoir, Oxfordshire. The need for a new substation is in direct response to customer demand.

There are currently four customers with signed agreements in the area and it is vital to ensure this substation can come forward, irrespective of whether the Project is ultimately built out.

9. The outcome of a robust siting study undertaken by NGET has identified a preferred site for the proposed NGET Farmoor Substation, and NGET will be seeking its own consent through a standalone planning permission pursuant to the Town and Country Planning Act 1990.
10. This planning application for the NGET Farmoor Substation has not yet been made and NGET are targeting submission in 2026. Further, NGET will promote a compulsory purchase order (CPO) to ensure sufficient land rights can be acquired, if voluntary acquisition of the land is not possible.
11. The Project has allowed for a new substation in its proposals within parcel number 13-04, however this is not the NGET preferred location for this substation. The location proposed by the Project may be reverted to as a potential 'fallback' development site for NGET, if NGET is unable to obtain the necessary consents to develop the NGET Farmoor substation at its preferred site.
12. NGET understand that the Applicant's proposed substation has been included to ensure deliverability of the Project and that, if NGET is successful in obtaining such consents and land rights for the NGET Farmoor Substation, the Applicant intends to utilise the substation site identified within the DCO application for additional solar panels and the existing DCO Application facilitates this.
13. The inclusion of the substation within the DCO reflects the fact that there is a need for a new substation within this area on the basis that the existing Cowley substation does not have sufficient capacity for the Project connection or to facilitate connection of other upcoming development in the area (many of which already have connection requests) but represents a fallback position as set out above.
14. As there is a direct interaction between the Project and the Proposed NGET Farmoor Substation, it is essential that the Project and any subsequent Development Consent Order recognise this interaction, and that the protective provisions ensure that future working can be agreed between the parties. It is vital to ensure that there are no restrictions which would prevent the development of the NGET Farmoor substation at the NGET preferred site or at the site proposed within the Project, if this option is ultimately required.
15. Further, NGET's view is that wording should be included within the DCO to make clear that the Applicant's substation will only be brought forward if NGET is unable to obtain the necessary consents and land rights to enable the NGET Farmoor Substation to be brought forward.
16. NGET must ensure adequate projection for its future projects both in terms of protection for the ability to deliver and operate/maintain future assets, as well as ensuring that future land and rights for the delivery of these projects are not jeopardised.
17. Overarching National Policy Statement (NPS) for Energy EN-1 states that "[t]o support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development" (para 4.11.3).
18. This is reflected in the NPS for Renewable Energy Infrastructure EN-3 which states at paragraph 2.8.34 that "a more co-ordinated approach to offshore-onshore transmission is required."
19. In line with good practice and the new policy considerations in the updated Energy NPS', particularly EN-5, which requires that "2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;", NGET

will co-operate on co-ordination in respect of the Farmoor substation and seek to develop co-ordination and co-operation in the same localities with regards to the Farmoor substation.

*Protective Provisions*

20. Further to NGET's relevant representations, NGET will require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. This includes both existing assets and future planned assets as described above.
21. NGET is liaising with the Applicant in relation to bespoke protective provisions in respect of NGET's assets. Negotiations are ongoing but the protective provisions are not yet agreed.
22. NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations.
23. NGET will continue to liaise with the Applicant with a view to concluding matters as soon as possible during the DCO Examination, keeping the Examining Authority updated in relation to these discussions.

*Compulsory Acquisition Powers in respect of the Project*

24. Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights.

*Further Representations*

25. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with Proposed NGET Farmoor substation or any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.

**RESPONSE TO ACTION POINTS FROM ISSUE SPECIFIC HEARING 1**

1. NGET was not able to attend Issue Specific Hearing 1 but has been liaising with the Promoter since the hearings to provide information requested.
2. Further, NGET were asked to provide a response to Action Point 7: "National Grid to confirm the parameters for joining into 400kV line, in particular whether is it possible to connect anywhere along the line."
3. In theory, a connection can be made anywhere along an overhead line. In practice, in determining the optimum connection point along an existing overhead line, NGET weigh up a number of factors including, but not limited to,
  - (a) the topography of the land,
  - (b) ecology,

- (c) archaeology,
  - (d) land availability,
  - (e) ground conditions,
  - (f) visual impact,
  - (g) proximity to customer connection points,
  - (h) ease of access for construction. and
  - (i) cost to the consumers.
4. NGET aims to build its new substations as close as possible to the existing overhead line (taking into account the factors listed above) as this minimises the additional infrastructure works required to connect onto the transmission network which in turn lowers the environmental impact as well as the impact on landowners.
5. When connecting to a new substation, modifications to the overhead line will be required. This will include constructing temporary towers to divert the overhead line to enable the construction of new overhead line towers that will terminate at the new substation.
6. NGET has a licence obligation to provide connections to electricity transmission network across England and Wales. The need for a new substation has arisen in directed response to customer demand. There are four customers with signed agreements in the area. As a regulated business, NGET has a legal obligation to meet these requests which has necessitate the provision of a new substation in this location as there is not sufficient capacity at existing sites or available land at existing sites.
7. In considering the design and siting of new electricity infrastructure, NGET has regard to the “Horlock Rules”. These rules have underpinned our own siting study which has determined an initial preferred site for the Proposed NGET Farmoor substation which is considered to be preferable from an environmental and planning perspective.

**CMS CAMERON MCKENNA NABARRO OLSWANG LLP**

**4 JUNE 2025**