



Fosse Green Energy

EN010154

9.20 Technical Note for the proposed
National Grid substation near Navenby

VOLUME

9

Planning Act 2008 (as amended)

Regulation 8(1)(k)

Infrastructure Planning (Examination Procedure)

Rules 2010

20 March 2026

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Fosse Green Energy
Development Consent Order 202[]

9.20 Technical Note for the proposed National Grid substation near Navenby

Regulation Reference	Regulation 8(1)(k)
Planning Inspectorate Scheme Reference	EN010154
Application Document Reference	EN010154/EXAM/9.20
Author	Fosse Green Energy Limited

Version	Date	Issue Purpose
Rev 1	20 March 2026	Deadline 3



Table of Contents

1.	Introduction	1
2.	Policy context in relation to the grid connection	3
3.	Proposed Navenby Substation.....	5
4.	Summary.....	15

1. Introduction

- 1.1.1 An application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for Fosse Green Energy (the Proposed Development). The Application was submitted by Fosse Green Energy Limited (the Applicant) on 18 July 2025 and was accepted for examination on 15 August 2025. The examination into the Application commenced on 6 January 2026.
- 1.1.2 The Proposed Development will comprise the construction, operation (including maintenance) and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with battery storage, onsite substation and associated infrastructure to generate and export/import electricity.
- 1.1.3 The associated infrastructure includes, but is not limited to, access provision, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kilovolt (kV) underground grid connection cable (approximately 10kilometre (km)), connecting to the national electricity transmission network at a proposed National Grid substation near Navenby (the proposed Navenby substation).

1.2 Consideration of the proposed Navenby Substation in the Application

- 1.2.1 In order for the Proposed Development to connect to the grid, the Order Limits include the land where the proposed Navenby substation will be located. Accordingly, Schedule 1 of the Draft DCO **[REP2-005]** includes Work Nos. 5A and 5B which relate to the laying of high voltage cables and connection works to the proposed Navenby substation. The works set out in Schedule 1 of the Draft DCO **[REP2-005]** are as follows:
- a. Work No. 5A - works to lay high voltage electrical cables, access and temporary construction compound laydown areas for the electrical cables, to connect to the National Grid Navenby substation; and
 - b. Work No. 5B - high voltage connection works to the National Grid Navenby substation to facilitate connection of the authorised development to the National Grid Navenby substation.
- 1.2.2 Paragraph 3.4.5 of the Grid Connection Statement **[APP-200]** confirms that, all infrastructure within the proposed Navenby substation would remain under National Grid's control and the Applicant is only seeking the acquisition of rights over this area in order to carry out the required connection works (Work 5B).
- 1.2.3 For the delivery of the proposed Navenby substation, National Grid Electricity Transmission (NGET) will seek consent under the Town and Country Planning

Act 1990 (TCPA 1990). North Kesteven District Council (NKDC) is the relevant local planning authority.

- 1.2.4 NGET confirmed in their Deadline 2 submission **[REP2-051]** that the planning application for the proposed Navenby substation will be submitted to NKDC in mid-March 2026. The position was further updated at Issue Specific Hearing 4 where it was confirmed by NKDC that the planning application would be submitted on 27 April 2026. Based on the planning application requiring an Environmental Impact Assessment, the target determination timescale would be 16 weeks from submission.
- 1.2.5 Paragraph 4.5.4 of the Planning Statement **[AS-098]** states that the principle of the proposed Navenby substation is supported in policy and subject to mitigation measures being appropriately applied, is expected to receive planning consent subject to satisfying all material planning considerations in accordance with policy requirements.

1.3 Purpose of this Technical Note

- 1.3.1 Given that planning consent has not yet been secured for the proposed Navenby substation, the Applicant has prepared this Technical Note in response to questions raised during Examination to provide further explanation on the following:
- a. Section 2 – the policy context in relation to the grid connection.
 - b. Section 3 – a high level policy appraisal of the proposed Navenby substation against the relevant Development Plan policies that would be considered in determination of a planning application. In addition, the relevant paragraphs from the National Planning Policy Framework along with policy support contained in the Energy National Policy Statements are set out, given these would be material considerations.
 - c. Section 4 – provides a summary of this Technical Note.

2. Policy context in relation to the grid connection

- 2.1.1 Fosse Green Energy (the Proposed Development) will be determined under the energy National Policy Statements (NPSs), in accordance with s104 (2) of the PA 2008. The relevant NPSs¹, which were published in November 2023 and came into effect on 17 January 2024 are set out below:
- a. Overarching National Policy Statement for Energy (EN-1) (NPS EN-1);
 - b. National Policy Statement for Renewable Energy Infrastructure (EN-3) (NPS EN-3); and,
 - c. National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5).
- 2.1.2 There is no requirement to have a grid connection or even to have secured a grid connection prior to making an application for a Solar DCO. Paragraph 4.11.6 of NPS EN-1 explains that it is open to operators without a grid connection to make a DCO application and provide information in the application to demonstrate that there is no obvious reason why a network connection would not be possible.
- 2.1.3 Paragraph 4.11.7 of NPS EN-1 indicates a preference for applications for new generating stations and related infrastructure to be contained in a single application to the Secretary of State or in separate applications submitted in tandem which have been prepared in an integrated way.
- 2.1.4 However, Paragraph 4.11.8 also provides that:
- “On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.”*
- 2.1.5 A footnote to paragraph 4.11.8 acknowledges *“...different levels of information may be available at different times and as such applicants should take a proportionate approach to what information should be included.”*

¹ The energy NPSs were updated in December 2025 and came into force on 6 January 2026. However, in line with the transitional arrangements, as the Application was accepted by the Planning Inspectorate for examination on 15 August 2025, and the updated energy NPSs came into force on 6 January 2026, the energy NPSs set out in paragraph 2.2.1 have effect in relation to the Proposed Development.

It should be noted that the energy NPSs relevant for the purposes of determination of the proposed Navenby substation, will be those designated in January 2026.

- 2.1.6 Thus, the policy approach asks Applicants to explain the reasons for the separation of applications and to confirm there are no obvious reasons why the other elements are likely to be refused.
- 2.1.7 The proposed Navenby substation will serve more projects than just the Proposed Development being the sole identified grid connection point for more than 3.2 GW of new renewable capacity across multiple NSIP and TCPA 1990 electricity generating stations, which at the time of writing includes Springwell Solar Farm, the Proposed Development and Leoda Solar Farm, as well as two standalone large-scale battery energy storage systems (BESS), including the Navenby BESS and the Brant BESS. Accordingly, NGET has determined that it should apply for the consent for the proposed Navenby Substation, as this will ensure that it will serve the needs of all operators and allow it to retain control over the placement, design and consenting process.
- 2.1.8 As set out in paragraph 3.4.1 of the Grid Connection Statement **[APP-200]**, NGET has a legal obligation to provide the Proposed Development and other energy generators with a connection to the National Electricity Transmission System (NETS). It should also be noted that under NGET's Licence (standard licence condition D4A) NGET is required to undertake all reasonable steps to obtain the required consents for the proposed Navenby substation.
- 2.1.9 Schemes may elect to make use of existing and available points of connection to the NETS insofar as such connection points exist. However, this is not always possible and new substations will be needed to facilitate the connection of schemes which are not located near existing substations with available capacity. Similar to the DCO Application for the Proposed Development, other solar NSIP schemes are coming forward with connections at new substations where their consent is not included in the DCO, such as North Humber to High Marnham [EN020034] and Rosefield Solar Farm (Planning Inspectorate Case Number: EN010158). Conversely, the Applicant is also aware that the Botley West Solar Farm (Planning Inspectorate Case Number: EN010147) included a new National Grid substation within its DCO application. However, this was as a result of there being two sites under consideration by National Grid, one of which was located within its Order Limits. This is not the case with the Proposed Development, given National Grid identified a suitable site for construction and operation of the proposed substation.

3. Proposed Navenby Substation

3.1 Background

3.1.1 A Screening Opinion (Reference: 24/1080/EIASR) was issued by NKDC in September 2024 which confirmed that the construction of the proposed Navenby Substation comprises Environmental Impact Assessment (EIA) development, under Schedule 2, Class 3(a) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Furthermore, a Scoping Opinion was issued by NKDC in August 2025 which confirms the scope of the EIA (Reference: 25/0699/EIASCO).

3.2 Site Context

3.2.1 The Scoping Report submitted by NGET provides the context of the site, set out below, for the proposed Navenby substation (the Site) which is located approximately 1.1km east of Navenby, centred on Grid Reference 501010 357861.

3.2.2 There are no landscape designations within the Site, however the Lincoln Cliff, located to the west, comprises a steep scarp slope running north south and is designated as an Area of Great Landscape Value in the Central Lincolnshire Local Plan.

3.2.3 There are no statutory sites designated for their biodiversity value at an international, European or national level within the Site. However, a portion of the Navenby Heath Road Verges Local Wildlife Site and a veteran tree are located within the Site.

3.2.4 There are no World Heritage Sites, scheduled monuments, Registered Historic Parks and Gardens, or Registered Historic Battlefields within a 2 km study area. There are no designated or non-designated heritage assets within the Site, although there are listed buildings located in Navenby and Boothby Graffoe.

3.2.5 The Site is located on Grade 2 Best and Most Versatile (BMV) agricultural land based on Provisional pre-1988 Agricultural Land Classification mapping.

3.2.6 There are no main rivers or ordinary watercourses in the Site and the Site is located in Flood Zone 1.

3.2.7 The Site is located in a Limestone Mineral Safeguarding Area.

3.3 Planning Application

3.3.1 The application for the proposed Navenby Substation is to be made by NGET pursuant to the TCPA 1990. The application will therefore be assessed against the Development Plan, the Central Lincolnshire Local Plan (CLLP) (adopted April 2023), and other material considerations. Those other material considerations will include:

- a. The need for the scheme;

- b. The National Planning Policy Framework (December 2024, amended in February 2025) (NPPF); and,
- c. The Energy National Policy Statements.

3.4 Appraisal

- 3.4.1 The high-level appraisal below is based on the information contained in the Scoping Report and considers the principle of the development of the proposed Navenby substation against the Development Plan, the NPPF and the Energy National Policy Statements.
- 3.4.2 A number of policies contained in the Development Plan require need to be established and the benefits to outweigh harm. In terms of need and benefits, Paragraph 1.1.6 of NPS EN-5 (2025) sets out that “there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations.” NPS EN-1 (2025) applies a policy presumption that CNP Infrastructure that, subject to any legal requirements (including under section 104 of the Planning Act 2008), it is likely that the urgent need for CNP Infrastructure to achieving the government’s energy objectives, together with the national security, economic, commercial, and net zero benefits, will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances.

The Principle of the Development

- 3.4.3 Policy S14 ‘Renewable Energy’ of the CLLP sets out that the Central Lincolnshire Joint Strategic Planning Committee “*is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire*”.
- 3.4.4 The CLLP provides policy support for the proposed Navenby substation under Policy S16: Wider Energy Infrastructure which endorses significant investment in new and upgraded energy infrastructure. This includes upgraded or new electricity facilities such as transmission facilities, substations, and other related infrastructure, particularly where they contribute to the transition towards a net-zero carbon sub-region. Although the policy supports such infrastructure in principle, successful planning consent will depend on a thorough assessment of the application against these planning policies and any site-specific considerations. As there is currently no layout plan available for the proposed substation in the public domain, a project specific assessment cannot yet be carried out, but NGET has adopted a number of principles in relation to the design, siting and mitigation for substations which seek to avoid, reduce and mitigate potential harm and are considered below.

Landscape, Design and Amenity

- 3.4.5 Policy S16 of the Central Lincolnshire Local Plan emphasises that all reasonable opportunities should be taken to mitigate any potential harm that

may arise from these developments. This includes the selection of an appropriate site and the incorporation of design solutions, as detailed in “Policy S53: Design and Amenity”, to minimise environmental and community impacts.

- 3.4.6 The design and siting of the proposed Navenby substation would be expected to adhere to the Horlock Rules², established by NGET, which require that proposals for new (and extended) substations consider residential amenity and take steps to minimise intrusion into surrounding areas. The Horlock Rules are set out in NPS EN-5 at paragraphs 2.9.18 to 2.9.19.
- 3.4.7 Based on information on NGET’s proposed Navenby Substation project webpage, NGET has undertaken a formal substation siting study, which shortlisted five possible sites. From these five evaluated sites in the local area, a rigorous optioneering process was carried out, taking into consideration the impact on the local community, proximity to the existing overhead line to reduce the need for new pylons, environmental factors, land availability and other key measures. In addition, the Scoping Report explains that the siting study area is also based on the proximity to the customers seeking connection agreements. Through consideration of all these factors, the Site was selected as the most suitable location.
- 3.4.8 It is clear therefore that the Development Plan supports the provision of the proposed Navenby substation (and any associated lines necessary to connect it to the network) in principle.
- 3.4.9 Policy S53: Design and Amenity, requires development in general to achieve high quality sustainable design that contributes positively to local character, landscape, townscape, and supports diversity, equality and access for all. Whilst the detailed design of the proposed Navenby Substation would be undertaken post-consent, in accordance with the Horlock Rules, there is a need to balance technical considerations with wider environmental constraints and other considerations, including landscape and landscape fabric. On the basis that NGET will be following the Horlock Rules, the Applicant believes that there is no reason to assume that the requirements of Policy S53 will not be satisfied. It is therefore the Applicant’s view that there is no evidence which demonstrates that conflict with this policy is likely to arise such that there is an obvious reason why planning permission would be refused.

Ecology and Biodiversity

- 3.4.10 Policy S60 ‘Protecting Biodiversity and Geodiversity’ of the CLLP seeks to protect biodiversity, stating that all development should protect, manage, enhance and extend ecological network of habitats, species and sites of international, national and local importance and minimise impacts on biodiversity and features of geodiversity value. For local sites, where development would result in an adverse effect, proposals would only be supported where the benefits of the development outweigh the loss. Proposals

² The National Grid Company Plc NGC Substations And The Environment: Guidelines On Siting And Design - <https://www.nationalgrid.com/sites/default/files/documents/13796-The%20Horlock%20Rules.pdf>

should deliver at least 10% biodiversity net gain in accordance with Policy S61 'Biodiversity Opportunity and Delivering Measurable Net Gains'.

- 3.4.11 Although it has not established whether there would be an adverse ecological effect at this point, design and siting of the proposed Navenby substation would be undertaken in accordance with the Horlock Rules and therefore harm to ecology and biodiversity would be minimised. The benefits of the proposed Navenby substation are set out in paragraph 3.4.2 of this Technical Note.

Historic Environment

- 3.4.12 Policy S57 'The Historic Environment' of the CLLP emphasises the duty that proposals have to protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire. Development proposals that result in harm to heritage assets will only be granted permission where it is necessary to achieve substantial public benefits that outweigh the harm.
- 3.4.13 It has not been established whether there would be any harm as a result of the proposed Navenby substation, although this is considered unlikely given there are no designated or non-designated assets within the Site. In any case, the design and siting of the proposed Navenby substation would be undertaken in accordance with the Horlock Rules and therefore any harm would be minimised. The benefits of the proposed Navenby substation are set out in paragraph 3.4.2 of this Technical Note.

Agricultural Land

- 3.4.14 Policy S67 'Best and Most Versatile Agricultural Land' emphasises the need to protect the best and versatile agricultural land and states that proposals resulting in significant loss of the best and most versatile agricultural land will only be supported if need has been clearly established, the benefits outweigh the need to protect such land there is insufficient lower grade land available, impacts have been minimised through design and, where feasible, land is restored to its previous use on cessation of any development.
- 3.4.15 With policy support for the proposed Navenby substation contained in Policy 14 of the CLLP, and paragraph 168 of the NPPF (see paragraph 3.4.2 of this Technical Note), need is established. Furthermore, as set out in the Scoping Report, the preference at option stage was for locations in close proximity to the existing overhead line to align with the Horlock Rules, specifically design and line entry requirements and the need to reduce wire span in the open landscape. Given these requirements, and the extent of anticipated Grade 2 BMV agricultural land east of Navenby, a logical conclusion would be that it is not possible to locate the proposed Navenby substation on lower grade land elsewhere.

Flood Risk

- 3.4.16 Policy S21 'Flood Risk and Water Resources' states that all proposals will be considered against the NPPF, the sequential test and exception test (if necessary), and development should not place itself or existing land or

buildings at an increased risk of flooding and that the development should be safe for its lifetime considering climate change.

- 3.4.17 The sequential test will need to be considered as the development would comprise a 'major' application as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015. Given the entire Site lies within Flood Zone 1, NGET can demonstrate that the sequential test is passed. In relation to the exception test, the proposed Navenby Substation comprises essential infrastructure in accordance with Annex 3: Flood risk vulnerability classification of the Government's Planning Practice Guidance as it comprises "infrastructure for electricity supply". In accordance with Table 2 Flood risk vulnerability and flood zone incompatibility of the same guidance, the proposed Navenby substation would be an acceptable use in Flood Zone 1 and therefore the exception test is not required.

Minerals Safeguarding

- 3.4.18 Policy M11 'Safeguarding of Mineral Resources' of the Lincolnshire Minerals and Waste Local Plan, Core Strategy and Development Management Policies, (adopted June 2016), seeks to safeguard mineral resources that are of current or future economic importance and that planning permission would be granted for development within a safeguard area provided that it would not sterilise mineral resources or prevent future minerals extraction on neighbouring land. The potential for the proposed Navenby substation to prevent future mineral extraction on neighbouring land is considered unlikely when considering the extent of limestone resources in the area relative to scale of the development.
- 3.4.19 Moreover, as set out in the Scoping Report, the preference at option stage was for locations in close proximity to the existing overhead line. As a result, a logical conclusion would be that it is not possible to avoid the Minerals Safeguarding Area given its wide extent in the Navenby area.

Compliance with the Development Plan

- 3.4.20 Given the above appraisal, it is considered that there is no obvious reason to conclude that the proposed Navenby substation would conflict with the Development Plan as a whole.

3.5 National Planning Policy Framework

- 3.5.1 Paragraph 161 of the NPPF states that "*the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.*"
- 3.5.2 Paragraph 168 of the NPPF explains:

“When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;

b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions...”

3.5.3 In addition, the draft National Planning Policy Framework (December 2025), which contains national decision-making policies that retain the supportive policy approach and also clearly relate the policy support to electricity network infrastructure, states:

W3: Renewable and low carbon energy development and electricity network infrastructure

1. In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:

a. The benefits of such development for improving energy security, supporting economic development and moving to a net zero future;

b. In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and

c. The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits.

2. Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure.

3.5.4 Therefore, the need for the proposed Navenby substation is established and does not need to be demonstrated. That need is to be ascribed significant weight in the determination of the application for the proposed Navenby Substation.

3.5.5 By minimising impacts and providing mitigation where practical and appropriate, as demonstrated above in relation to the Development Plan, there should be no conflict with any relevant policy within the NPPF as the NPPF is clear that the benefits of the principle of development are to be given significant weight.

3.5.6 As a result, it can be concluded that the policies in the NPPF are likely to support the grant of permission and are not likely to present any obvious reason for refusal.

3.6 Energy National Policy Statements

- 3.6.1 Paragraph 5 of the NPPF explains that national policy statements form part of the overall framework of national planning policy, and “*may be a material consideration in preparing plans and making decisions on planning applications*”. Furthermore, paragraph 1.2.1 of NPS EN-1 states, “*In England, this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)*”.
- 3.6.2 Paragraph 1.2.1 of NPS EN-1 goes on to state that “*Whether the policies in this NPS are material, and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy*”. Given the energy NPSs set out government policy in relation to electricity generation, transmission and storage including association infrastructure, such as substations, it is logical to conclude that the policy support for renewable energy infrastructure, such as the proposed Navenby substation, set out in NPS EN-1, NPS EN-3 and NPS EN-5 will be important material considerations in decision making. This includes the fact that the proposed Navenby Substation is Critical National Priority (CNP) Infrastructure. Paragraph 4.2.4 of NPS EN-1 states that the Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure and paragraph 4.2.5 of NPS EN-1 sets out that “*Low carbon infrastructure for the purposes of this policy means: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations.*”
- 3.6.3 Alongside this, Paragraph 1.1.1 of NPS EN-5 notes that “*the security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage and interconnection infrastructure that our country needs to meet rapid increase in electricity demand required to transition to net zero, while maintaining energy security*”.
- 3.6.4 Paragraph 2.1.5 reiterates “*as stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure.*”
- 3.6.5 Due to the proposed Navenby substation being CNP development, the energy NPSs will be an important material consideration for the decision maker in determining the proposed Navenby substation.
- 3.6.6 The starting point in favour of CNP infrastructure (as set out in paragraph 5.2.9 of the Planning Statement **[AS-098]**) may also apply as a material consideration to the application for the proposed Navenby Substation.
- 3.6.7 In addition to local policies, NPS EN-1, paragraphs 4.11.5 to 4.11.9 emphasise that the PA2008 encourages a holistic approach to planning, aiming to combine related project elements into a single application or coordinated submissions to improve efficiency and reduce environmental impact.

However, if separate applications are necessary due to differing timelines, legal entities, or regulatory frameworks, applicants should explain the reasons and confirm there are no clear obstacles to the approval of other project elements.

- 3.6.8 Multiple customers, including the Applicant, approached NGET requesting connections in the vicinity of Navenby. NGET have developed the Navenby proposals in response to these requests. The Applicant understands that NGET's proposals will have considered the needs of all customers while seeking to develop as efficient and environmentally sustainable solution as possible. Where offers have been provided to and accepted by customers, NGET has a duty to fulfil its responsibilities to provide those customers with a connection at Navenby or develop and deliver suitable alternative proposals. Applicants, including NGET as application for the proposed Navenby substation, must also ensure that their submissions comply with EIA regulations, addressing indirect, secondary, and cumulative effects.
- 3.6.9 Paragraph 2.2.3 of NPS EN-5 explains that *“the government’s legislative commitment to net zero by 2050, government’s expectation of 12-14GW of interconnector capacity by 2030, and an ambition of accelerating the deployment of clean energy capacity and energy storage to meet our ambitions for the Clean Power 2030 Mission, means that significant amounts of new electricity networks infrastructure is required”*.
- 3.6.10 Paragraph 1.1.5 of NPS EN-5 confirms that the identified near-term requirement for new network infrastructure is to directly support the government meeting its Clean Power 2030 Mission, including “in locations which have historically not had high amounts of network capacity”. For example, new network infrastructure is particularly needed in “some rural and coastal parts of the UK, including part of the east coast” to connect forms of clean energy generation which are located in those areas. Without such network infrastructure development, that mission cannot be achieved .
- 3.6.11 The proposed Navenby substation is needed to connect the Proposed Development and other schemes to the NETS. It is in close proximity to the existing overhead line into which it will connect, which in turn has available capacity to transmit the energy generated from the Proposed Development to consumers both locally and nationally. This aspect of the substation seeks to minimise any effects of routing the Scheme’s grid connection infrastructure.
- 3.6.12 The overhead line into which the Proposed Development and others will connect, is an existing part of the NETS with sufficient capacity to transmit the energy the Proposed Development and others will generate to local and national consumers. This is a key benefit of the substation
- 3.6.13 The energy NPSs provide considerable support for the proposed Navenby Substation and do not provide reasons why planning permission would be refused.

3.7 Consideration of Other Schemes Connecting to the Proposed Navenby Substation

- 3.7.1 Given the proposed Navenby Substation will lead to further renewable energy development, the nature of the development cannot logically weigh against the grant of planning permission. The developments which the proposed Navenby Substation will serve also have to obtain consent either through the DCO process or through the TCPA process. Nationally Significant Infrastructure Projects will be permitted pursuant to s104 of the PA 2008 where they accord with the relevant NPS and where the benefits of the scheme outweigh the harm. TCPA schemes will be permitted where they accord with policy or where the benefits outweigh any perceived conflict with policy. In either case, a scheme that relies upon the proposed Navenby Substation for connection will only be consented if the benefit of the scheme outweighs any associated harm.
- 3.7.2 Accordingly, the consequence of permitting the proposed Navenby Substation application would be that development which, in cumulation, results in a net positive benefit will come forward. Thus, in determining the application, the decision maker would be required, as a matter of logic, to weigh the net benefit delivered by each scheme, which is dependent upon the proposed Navenby Substation for connection, in the balance as a factor in favour of the grant of permission.
- 3.7.3 As a result, it can be concluded that given there are also other developments which rely upon the proposed Navenby Substation for connection cannot rationally provide a reason for refusing planning permission – rather it provides a reason why planning permission should be granted for it.

3.8 Precedent Schemes

- 3.8.1 For wider context, a search was conducted for other recent planning application approvals for NGET substations. High-level summaries of two cases are set out below.
- 3.8.2 An application for the erection of 132kV and 400kV GIS substations including six 460 MegaVolt Ampere (MVA) super grid transformers, gantries, office block, contractor compound, diesel generator, internal access roads, parking, drainage, lighting and CCTV, permanent access road, bridge crossing, landscaping and biodiversity enhancement, and fencing was submitted to Buckinghamshire Council (Reference: PL/24/0449/FA).
- 3.8.3 It was determined that the identified harm to landscape, heritage assets and the Green Belt did not outweigh the significant need for the substation, economic benefits and biodiversity net gain (BNG). This application was granted conditional approval in March 2025.
- 3.8.4 An application for the extension of the existing Norwich Main 400kV Substation to the west and includes associated temporary access roads was submitted to South Norfolk Council (Reference: 2024/1336).

3.8.5 The expansion of the Norwich substation is needed to connect the Hornsea Project Three Offshore Wind Farm (Planning Inspectorate Case Number: EN010080), and the Sheringham Shoal and Dudgeon Offshore Windfarm Extension (Planning Inspectorate Case Number: EN010109) and would also facilitate the connection of Norwich to Tilbury (Planning Inspectorate Case Number: EN020027), which are Nationally Significant Infrastructure Projects (NSIPs). It was determined that the proposed expansion was supported in principle by the Central Government planning guidance for assisting with the hosting of renewable energy and would contribute to net zero 2050 targets. No significant adverse effects were identified or any that would outweigh the benefits of the proposed development. This application was granted conditional approval in September 2024.

3.9 Appraisal Summary

3.9.1 Given the generally supportive national and local policy position, as described above, and on the basis that NGET take a responsible approach to siting, design and mitigation, following the Horlock Rules as set out in in NPS EN-5 paragraph 2.9.19, there are no obvious reasons that consent for the proposed Navenby Substation and associated overhead lines to connect it into the NGET would be withheld. On the contrary, it can be concluded that the proposed Navenby Substation:

- a. Assists in delivering significant generating capacity that goes towards meeting the significant need for renewable energy;
- b. Does not present any likely conflict with any part of the NPPF that would be likely to weigh significantly against the development;
- c. Does not present any likely conflict with any part of the relevant NPSs; and,
- d. Would assist in delivering development that would connect to it which logically will only come forward where it is acceptable in planning terms i.e. where its benefits will outweigh any harm.

4. Summary

- 4.1.1 The point of connection for the Proposed Development is the proposed Navenby substation, which NGET will seek consent for under the TCPA 1990, for determination by NKDC. NPS EN-1 recognises that it may not be possible to coordinate applications and that Applicants should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.
- 4.1.2 The proposed Navenby substation will serve a number of projects, including the Proposed Development. NGET has a legal obligation to provide the Proposed Development and other energy generators with a connection to the NETS, where NGET has made an offer and that offer has been accepted.
- 4.1.3 The need and benefits of the proposed Navenby substation and its status as CNP infrastructure demonstrate the level of policy support contained in the energy National Policy Statements, which are material considerations for the purposes of decision making. The high level policy appraisal of the proposed Navenby substation demonstrates the generally supportive policy position.
- 4.1.4 Therefore, on the basis that NGET follow the Horlock Rules by taking a responsible approach to siting, design and mitigation, the Applicant considers there are no obvious reasons that consent for the proposed Navenby substation would be withheld.