

Dated

27 August 2025

**APPLICATION BY RWE RENEWABLES UK SOLAR AND STORAGE LIMITED FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE PEARTREE HILL SOLAR FARM ORDER 202[]**

PLANNING INSPECTORATE REFERENCE NUMBER: EN010157

REGISTRATION IDENTIFICATION NUMBER: F4172D520

SUMMARY OF WRITTEN REPRESENTATION
submitted on behalf of National Grid Electricity
Transmission plc

Summary of Written Representation

- 1 NGET owns assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Peartree Hill Solar Farm Project (**Peartree Project**).
- 2 Additionally, NGET is bringing forward a number of project at this location comprising:
 - a) the construction of a new substation to the west of the existing Creyke Beck substation (**the Wanlass Beck Substation Project**);
 - b) the construction of a new substation to the north of the existing Creyke Beck substation (**Birkhill Wood Substation Project**) (the Wanlass Beck Substation Project and the Birkhill Wood Substation Project are in this representation together known as the **NGET Upgrade Projects**); and
 - c) the construction of an access road off the A1079 to facilitate the construction, maintenance and operation of the NGET Upgrade Projects and connectee projects (**Access Road**).
- 3 There is therefore significant infrastructure being delivered within the same area and potentially within similar timescales. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Peartree Project to ensure that each project can be delivered without unduly interfering with other connectee projects. This is provided for in the form of protective provisions that NGET is seeking to include in the Order (**NGET Protective Provisions**).
- 4 NGET's Protective Provisions include safeguarding wording in relation to future infrastructure that was secured in the recently granted Awel y Môr Offshore Wind Farm Development Consent Order and the Mona Offshore Wind Farm DCO.
- 5 In addition, while the Draft Order does contain generalised protective provisions for the protection of electricity, gas, water and sewerage undertakers (**General Protective Provisions**), NGET does not consider that these are sufficiently precise as to protect NGET's interests and have identified a number of shortcomings (in addition to those noted above):
 - a) Approval Process: The General Protective Provisions do not provide a detailed process for the approval of works that affect NGET apparatus and the setting out of requirements to enable development to take place.
 - b) Indemnities, expenses and costs: The General Protective Provisions do not provide an indemnity for the benefit of gas undertakers, instead it provides for the making of reasonable compensation. This is not sufficient or appropriate for NGET. In addition, the General Protective Provisions do not provide for the provision of insurance or security prior to the commencement of the development. NGET (along with many statutory undertakers) require that both are put in place to ensure that NGET is not unduly financially burdened as a result of a development.
 - c) Physical access: The General Protective Provisions ensure that where works are near or affecting apparatus, access arrangements are provided for, but no more than that.
- 6 NGET's solicitors Addleshaw Goddard LLP have been engaging with the Promoter's solicitors and discussions are ongoing to be able to agree a set of protective provisions to be included in the draft Order.

- 7 Until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve its right to make further submissions to the Examination at a later date, including appearance at any hearings in due course.

Addleshaw Goddard LLP

For and on behalf of National Grid Electricity Transmission plc

27 August 2025