

Submission ID: SA141037C

Please find attached Written Representations (including summary) submitted on behalf of National Grid Electricity Transmission Limited.

Please acknowledge receipt.

National Grid Electricity Transmission Plc Written Representation

Rosefield Solar Farm Consent Order

(Statutory Undertaker Registration Number [REDACTED])

- 1.1 This Written Representation is submitted on behalf of National Grid Electricity Transmission (“**NGET**”) in respect of the application by Rosefield Energyfarm Limited (“the **Applicant**”) for the Rosefield Solar Farm Development Consent Order (“the **Order**”) to authorise the Rosefield Solar Farm Project (“the **Project**”).
2. **Interface with East Claydon Project**
- 2.1 As set out in the Relevant Representation, the proposed Order Limits overlap with land required for the siting of future NGET infrastructure which includes the following:-
- works to East Claydon 400 kV and 132 kV substations (the “Existing Substation”) with a new 400 kV and 132 kV substation (the “New Substation”); and
 - Reconfiguration of the existing overhead line (OHL Works).
- together the “East Claydon Project”.
- 2.2 NGET have identified a site immediately adjacent to the west of Existing Substation for the New Substation. As provided in NGET's Relevant Representation, the New Substation involves works to the Existing Substation and eventual decommissioning, which lacks sufficient electrical capacity to connect multiple new customers, as well as the reconfiguration of the existing overhead lines.
- 2.3 The Applicant recognises in sections 3 and 4 of the Grid Connection Statement NGET's proposals for the East Claydon Project and the key role that the East Claydon Project and NGET will play in facilitating the connection of the Proposed Development to the National Grid.
- 2.4 As explained in the RFI Response, the New Substation is in detailed engineering design stage. NGET is operating in a context of balancing site constraints coupled with design input required from connecting customers, and consequently the time required to complete FEED design is ongoing. NGET have taken great care in both its optioneering and land acquisition strategy to be proportionate in identifying land plots for the delivery of the East Claydon Project and are hopeful that the Applicant will similarly take NGET's considerations into account. A collaborative approach is vital to the delivery of the East Claydon Project.

Affected Plots

- 2.5 The Applicant is seeking temporary possession in land over plots 6/8 and 7/10, compulsory acquisition of permanent rights over plots 6/10, 6/11, 6/12, 7/1, 7/2, 7/4, 7/5, 7/6, 7/7, 7/8 and freehold permanent acquisition of plots 6/13, 7/3, 7/9, 7/11, 7/12.
- 2.6 As expressed by NGET in its Relevant Representation and in its RFI Response of 9 January, NGET does not hold an in principle objection to the Applicant's Project, however NGET remains concerned regarding the extent of the Order Limits, particularly around Plots 7/1, 7/2, 7/4 7/5, 7/9, and 7/12.
- 2.7 The sites of plots 7/1, 7/2, 7/4 and 7/5, are within the footprint of the substation replacement works proposed under the East Claydon Project. Plots 7/9 and 7/12, which are subject to permanent freehold acquisition in the Order, are critical to the delivery of the East Claydon Project.
- 2.8 These plots are fundamental to NGET's design and delivery of the East Claydon Project. There are constraints on where NGET can relocate its 400 kV overhead line route 4ZL, 4YH and 4YJ, which would need to be reconfigured to the south within plots 7/9 and 7/12 to enable to connect to NGET's New Substation.
- 2.9 NGET are in productive discussions with the Applicant to date, and will continue to work with the Applicant to resolve issues of design in the above plots. Critical to these discussions will be an agreed form of protective provisions, that will put in place appropriate protections such that the delivery of the replacement East Claydon Substation is not prevented, as well as securing clearances and easements. The current position regarding protective provisions, clearance and easements is set out in section 4 of this Written Representation.

3. Protective Provisions

- 3.1 As stated above, NGET requires protective provisions to be included within the draft Development Consent Order (the "Order") for the Project.
- 3.2 The Order includes proposals for the placing of a generating station within an area adjacent to land on which the existing OHL and Existing Substation is located. NGET's protective provisions therefore contain provisions which protect its existing assets and its ability to deliver the East Claydon Project. The protective provisions submitted to the Applicant include the following protections:-
- (i) the Applicant will not exercise its compulsory powers over NGET operational land without the consent of NGET;

- (ii) the Applicant will not exercise its compulsory powers over land identified for the delivery of the East Claydon Project without the consent of NGET¹; and
 - (iii) that all NGET assets, both existing and any anticipated future assets, are adequately protected and that all works comply with relevant safety standards.
- 3.3 As set out in the Relevant Representation, there is a clear precedent for the protection against future assets, such as the East Claydon Project, in the protective provisions within Development Consent Orders. Examples of these include the Protective Provisions secured by NGET in the Awel Y Mor DCO and Mona Offshore Wind DCOs. Protections were sought in these DCOs because NGET was bringing forward a project to upgrade the existing Bodelwyddan substation and therefore specific Protective Provisions were included to avoid those future NGET works to the Bodelwyddan substation from being prejudiced by the DCO Projects. This is a proportionate approach, in line with PINS Guidance, for the protection of important infrastructure that is critical to support the National Grid.
- 3.4 As such, NGET seeks a form of Protective Provisions based on those included in the AYM DCO and the recently granted Mona DCO, which will secure protections in respect of NGET's East Claydon Project. The Protective Provisions will prevent the proposed location of the Rosefield substation from impeding the East Claydon Project works, including the reconfiguration of the NGET OHL which are required order to construct and operate the New Substation as part of the East Claydon Project.
- 3.5 NGET has communicated with the Applicant who is aware that the land may be required in order to facilitate temporary or permanent towers, and/ or OHL. NGET has previously acknowledged the Applicant's position, that those limits extend to a larger area than may be required in practice for the delivery of the proposed development, in order to allow for flexibility, taking into account design development. The Applicant has explained to the Examining Authority that this is a deliberate design approach, adopting the 'Rochdale Envelope'. NGET appreciates that the Applicant confirmed on the CAH1 hearing on Wednesday 25 February that it was committed to continue to negotiate with NGET and that as more certainty emerges the Applicant would keep revisiting the "flexibility" point with NGET.
- 3.6 NGET is committed to working with the Applicant and is in active discussions to negotiate the Protective Provisions submitted to the Examination.

4. **Easements and Clearances**

- 4.1 It is expected that further clearances will be required for the East Claydon Project. The *Technical Guidance Note 287 - Third-party guidance for working near National Grid Electricity Transmission equipment* ("TG 287

¹ See draft Protective Provision submitted with NGET Relevant Representation, submitted 11 December 2025, specifically paragraphs 7(1) and 7(2). These provisions are drafted in line with those included in The Awel y Mor Offshore Wind Farm Order 2023 to manage pragmatic interface with the Bodelwyddan Project.

Note”) provides an overview of the statutory requirements for working near high-voltage electricity, including electrical safety clearances, minimum access clearances, and risks and hazards when developing close to electrical infrastructure. These are summarised in the table below.

4.2 Summary of Clearances required

Clearance Type	Description
Access Clearances	The TG 287 Note prescribes that, 'NGET needs to have safe access for vehicles around its assets and work that restricts this will not be allowed'. It explains that works within 30m of a tower base might affect the foundations of the towers and that the 30m clearance is to be maintained at all times to allow a route wide enough for an HGV and to access our sites, towers, conductors and underground cables at short notice
Statutory Electricity Clearance from Overhead Lines ("OHL")	<p>Electrical safety clearances must be maintained at all times and are set out in full in the Energy Networks Association (ENA) Technical Specification for 'overhead line clearances' 43-8 ("TS 43-8").</p> <p>The TG 287 Note provides that the minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag, sag being the vertical distance between the wire's highest and lowest point and that, 'power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this'.</p>
East Claydon Project - Existing Overhead Lines ("OHL") Clearances	<p>There are three southern OHL which all connect into the Existing Substation.</p> <ol style="list-style-type: none"> 1) East Claydon to Cowley 2) East Claydon to Amersham-Iver and 3) East Claydon to Leighton Buzzard-Sundon <p>All three existing OHL benefit from established rights in land, which provide NGET with an easement width of 30m either side of each tower base and OHL (30m radius and 60m diameter).</p> <p>This 30m is required in order for NGET to properly maintain and operate its assets for the transmission of electricity in accordance with its Electricity Transmission Licence. The area proposed by the Applicant for the generating station in the Order is immediately coterminous with all three existing OHL. The relevant plot numbers are 7/9 and 7/12.</p> <p>The existing OHLs are proposed to be diverted as part of the proposed East Claydon Project, and it is vital that such clearances are maintained. NGET is confident that the Applicant accepts this requirement. At this stage of design the extent of such easements</p>

	cannot be defined. As design development continues, the Parties will obtain clarity on such land requirements.
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4.3 New East Claydon Substation - Easement

4.4 The TG 287 Note guidance requiring 30m easement is reiterated in NGET's standard Deed of Grant of Easements for OHLs which provides that a 30m easement (from the tower base) and protective covenants are required, in order to prevent obstruction and to maintain access for operation and maintenance purposes. In all events, for safety and operational purposes, NGET will require easement strips in place to reflect the requirements of TG 287.

4.5 Reconfiguration of Existing OHL

4.6 Engineering assessments and line plans are being prepared in relation to the reconfiguration of all three southern OHL, as well as the gantry to the Existing Substation. The current OHL alignment into the Existing Substation is already very congested. It is anticipated that turn-ins from the existing OHL are required, which may require any of the following:

4.6.1.1 repositioning of existing towers;

4.6.1.2 additional towers varying in height; temporary towers; temporary use of land for construction;

4.6.1.3 oversailing;

4.6.1.4 new OHL; and

4.6.1.5 restringing the existing OHL.

5. **NGET East Claydon Project – Status of Planning Application and CPO discussions**

5.1 We note that the ExA asked about the submission of the planning application for the New Substation at the CAH1 Hearing. NGET are currently developing its planning application together with detailed engineering drawings to authorise the construction, operation and maintenance of a New Substation at East Claydon and associated OHL. NGET have made good progress in pre-application discussions with the local planning authority. NGET's lands team have on-going discussions with land owners about acquiring land and rights by voluntary agreement, and where this is not possible, NGET will promote a compulsory purchase order.

6. **Conclusion**

6.1 NGET remains committed to constructive engagement with the Applicant. However, the successful delivery of the East Claydon Project is essential to maintaining the integrity and future resilience of the National Electricity Transmission System. NGET therefore seeks inclusion of an appropriate

form of its protective provisions, required clearances and easements, and assurance that land critical to the East Claydon Project is protected.

Summary of Written Representation

This Written Representation is submitted on behalf of National Grid Electricity Transmission ("NGET") in respect of the application by Rosefield Energyfarm Limited ("the Applicant") for the Rosefield Solar Farm Development Consent Order ("the Order") to authorise the Rosefield Solar Farm Project ("the Project").

NGET does not hold an objection in principle to the Applicant's Project, however NGET remains concerned regarding the extent of the proposed Order Limits which currently overlap with the land required for the siting of the future NGET infrastructure, comprising the replacement of an existing substation with a new substation and reconfiguration of overhead lines ("the East Claydon Project").

NGET has submitted to the Applicant an appropriate form of protective provisions for inclusion in the DCO which will include the following protections:-

- the Applicant will not exercise its compulsory powers over NGET operational land without the consent of NGET; and
- the Applicant will not exercise its compulsory powers over land identified for the delivery of the East Claydon Project without the consent of NGET.
- that all NGET assets, both existing and any anticipated future assets, are adequately protected and that all works comply with relevant safety standards.

NGET is in productive discussions with the Applicant to regarding the design interface issues, and critically to those discussions, agreeing the form of protective provisions which will secure the above protections. In addition NGET is cooperating with the Applicant to put in place any other relevant agreements to manage the interface of the projects.

NGET will also require relevant clearances including access clearances, statutory electricity clearance from overhead lines, and project specific clearances for the East Claydon Project. NGET will also require relevant easements in place to reflect technical guidance requirements.

NGET is operating in a context of balancing site constraints coupled with design input and consequently the time required to complete FEED design is ongoing. NGET have taken great care in both its optioneering and land acquisition strategy to be proportionate in identifying land plots for the delivery of the East Claydon Project and are hopeful that the Applicant will similarly take NGET's considerations into account.

A collaborative approach is vital to the delivery of the East Claydon Project and both Parties are continuing discussions in this manner.

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NGET reserves its position to respond to forthcoming deadlines in the examination.