

IN THE MATTER OF:
THE EXAMINATION OF THE APPLICATION FOR
THE STEEPLE RENEWABLES PROJECT DCO

SUMISSIONS MADE ON BEHALF OF
SNSE LIMITED & SNSD LIMITED
AT ISH 3 – 13.02.2026

APPEARANCES:

████████████████████ (instructed by ██████████ of Town Legal LLP) on behalf of SNSE Limited and SNSD Limited who are landowners for both the Steeple Renewables Project and parts of the North Humber to High Marnham Scheme.

SUBMISSIONS:

1. The landowner is fully supportive of (a) the DCO application for the Steeple Renewables Project and (b) the position advanced by ██████████ on behalf of the Applicant at this hearing in relation to the North Humber to High Marnham Project. It fully endorses those submissions and considers that it is now abundantly clear from the written material and the oral submissions that National Grid has fallen well short of demonstrating that it ought to have protective provisions in this DCO relating to future assets as part of the North Humber to High Marnham Project.
2. Further, the landowner, although it does not object to the principle of the North Humber to High Marnham Project, and recognises its obvious importance, has serious concerns about:
 - (i) The currently stated preferred route for the Project as identified by National Grid in its statutory consultation last year;

- (ii) The approach which National Grid has adopted in so doing, including the adequacy of the consultation which has been undertaken, noting that National Grid continues to be under a duty to properly undertake consultation;
 - (iii) The approach adopted to the consideration of alternatives to the currently stated preferred route, including the alternative route presented by the landowner which, even now, has not been fully appraised by National Grid (accepted at paragraphs 28 and 48 of National Grid's Deadline 3 Submissions [REP3-053]); and
 - (iv) The lack of proper and conscientious engagement with the landowner.
3. The landowner recognises that the North Humber to High Marnham Project will itself be subject to examination. The points, however, which it now wishes to raise (none of which are new to National Grid, the landowner having sought on many occasions, without success, to make these points to National Grid) are material to the matters which now arise for determination in this DCO application as identified by the Examining Authority in its agenda for this hearing.
4. These are all points which the landowner will also make fully and in depth as part of any future examination for the North Humber to High Marnham Project as they plainly will go right to the heart of whether development consent should be granted for that Project on the basis of the current and unsatisfactory route alignment.
5. The landowners concerns arise not only because of the clear impact which the proposed route for the North Humber to High Marnham Project would have on the Steeple Renewables Project (the extent of the sterilisation and economic impacts is stark, as set out by the Applicant in Appendix D to its Response to the ExAs First Written Questions [REPS-052]) but also on other, extremely important and nationally significant projects which the landowner wishes to facilitate on the land which would be affected. It is concerned, however, that the opportunities for it to do so, if the proposed route were to be consented, would be jeopardised. Those projects are a data centre on the landowner's land and also development relating to the STEP Nuclear Fusion project (which involves a very significant financial investment and commitment by the government and which is of national importance), which is planned to come forward at West Burton Power Station A. The benefits of those schemes (and the Nuclear Fusion scheme is, quite simply, groundbreaking) are very significant for the country as a whole, yet the preferred route will

seriously threaten or frustrate the landowner's ability to support those projects (and may well have significant implications for the STEP Project noting the closeness with which it comes to West Burton Power Station A, including the site access and the bordering railway).

6. The above is despite the fact that the landowner has presented an alternative route (a map showing that route is available within National Grid's own Deadline 3 Submissions [REP3-053] as figure six on page 13) to National Grid which it is plain is far preferable to its currently stated preferred route. The landowner remains unclear, and wholly confused, as to why National Grid does not wish to pursue that alternative route (or indeed any of the previous alternatives put forward by the landowner who has always sought to engage in a collaborative manner but who has been disappointed by the lack of engagement by National Grid with its efforts). It notes the high level and vague reasoning tentatively offered by National Grid in its Deadline 3 Submissions [REP3-053] at paragraph 47 but that is following only what it itself accepts was an initial appraisal. Moreover, it contains no genuine comparative analysis of effects, and will not withstand any real scrutiny.
7. Indeed, the landowner's experience is wholly at odds with the picture presented by paragraph 10 of National Grid's Deadline 3 Submissions [REP3-053] which speaks of direct engagement with the landowner and its agents on development design. The approach of National Grid, which has included serious errors in the consultation process for the North Humber to High Marnham Project (e.g. errors in the Design Development Report which omitted the western half of the Steeple Renewables Project from diagrams) has been such that the landowner is likely to argue as part of any future examination that it has fallen short of the duties imposed on it.
8. In terms of chronology, such was the concern of the landowner as to the impacts of the currently stated preferred route for the North Humber to High Marnham Project (and the landowner has thoroughly made clear to National Grid its objections to that route), that the landowner promoted a number of alternative routes for Pylons 4AF202 to 4AF221 from as early as 4 March 2025. It also made a design amendment request on 9 April 2025. The most recent alternative, which has been referred to by National Grid in its Deadline 3 Submissions [REP3-053], was presented to NGET on 15 December 2025.

9. It is extremely important to note that all those routes sit within the original identified route corridor for the North Humber to High Marnham Project as published by National Grid in 2023, i.e. the graduated green swathe identified by National Grid in 2023. This means that many of the reasons now said by National Grid to be reasons why the current route is preferable appear to be wholly inconsistent with its previously published position, e.g. as to an alleged need to avoid an interaction with the existing 132kV line which was not previously treated as an insurmountable obstacle.

10. The benefits of the alternative route are clear to see:

- (i) It will be cheaper for National Grid to deliver as the landowner has indicated to National Grid as early as March 2025 that, in respect of the Wood Lane Solar Farm (for which it is also the landowner), it would be prepared to not seek compensation and, as the landowner, to absorb the depreciation in the value of that scheme for the benefit of the project promoter. Land assembly costs would be reduced significantly as a result. It is wholly unclear, therefore, why National Grid persists, even as recently as its Deadline 3 Submissions [REP3-053] with an argument that it needs to avoid interaction with that project. That has not been explained and indeed appears wholly at odds with its proposed preferred route, the much greater level of impacts which this would have on generating capacity, and the request for protective provisions as part of this DCO.
- (ii) Further, the landowner has said that it will take all necessary steps to quickly complete land agreements with National Grid so as to allow for the undergrounding of the section of the 132 kV overhead line which would be crossed by the alternative route (where necessary). This will again make land assembly significantly easier and less expensive than the preferred route.
- (iii) The landowner will also be able to facilitate a more effective delivery of the construction timetable.
- (iv) The overall route would be reduced by approximately 1km, which would result in a very significant construction cost saving of approximately £3.8m (a figure calculated on the basis of the costings in National Grid's Preliminary Routing and Siting Study (2023))
- (v) It offers a better design and one which is more in line with the Holford Rules, e.g. by removing a significant dog leg proposed by Tower 4AF210. The landowner's

alternative would deliver a straighter line route between towers 4AF202 and 4AF221.

- (vi) It would overcome many of the serious material planning impacts of the preferred route, e.g. by moving the route away (a) from Sturton le Steeple, which has a number of important and statutorily designated heritage assets which would be impacted and (b) avoiding impacts on residential dwellings within Sturton le Steeple (something which the Holford Rules sees as desirable), noting its north to south alignment which inevitably increases the impact of a north to south aligned overhead line in close proximity to the west of the village. Moreover, unlike the preferred route, it will create a clear visual break and will not clutter the landscape.
- (vii) It will also avoid the likely traffic conflict and congestion which the landowner anticipates will be the result if the preferred route is consented. The landowner is concerned that this is not something which National Grid has properly considered, e.g. it does not appear to have accounted for the traffic operations from the consented quarry at Sturton le Steeple or properly considered the impacts on the village of significantly increased construction traffic, etc.

11. The landowner feels disappointed by the fact that, notwithstanding the fact that National Grid should take consultation responses and feedback into account, it appears that National Grid is determined to press ahead with its preferred route and not to properly consider and accept the many benefits of the route the landowner is willing and able to facilitate. There has been, therefore, no conscientious consideration. The approach also appears to be at odds with the requirement to carry out consultation at a formative stage and to take responses into account – the landowner’s experience is that this has not been the case.

12. This is highlighted by the fact that National Grid has not even taken the time and effort to carry out additional survey work on the landowner’s lands which would allow it to properly appraise the alternative route presented by the landowner. It is also highlighted by the letter received by the landowner on 2 February 2026 in which National Grid proposed only very tiny tweaks to the route and offered nothing of substance to address the concerns consistently raised by the landowner. In the absence of a proper appraisal, it is difficult to see how National Grid will ever be able to properly and fully justify the discounting of the alternative route. The best National Grid could say before today was that it had carried out an “initial appraisal” of the landowner’s alternative route but that it would provide an

update today to the ExA on a full appraisal (Deadline 3 Submissions [REP3-053] at paragraph 48). The landowner awaits with interest such an update given it has not received one.

13. In short, the landowner's position is that the public interest lies firmly in favour of an alternative route for the North Humber to High Marnham Project, which takes a more proportionate approach to impacting land in connection with that project in the public interest and which would, it is anticipated, result in reduced planning impacts and resolve clear planning objections. No cogent reasons, supported by evidence, have been provided by National Grid for why the alternative route is not being pursued. National Grid refers to delay but that is not a good reason as it could have continued to progress a route within the green swathe it identified in 2023 or, alternatively, have accepted the alternative route the landowner has been offering for nearly a year.
14. In light of the multiple benefits of the alternative route which the landowner advocates for, and the fact that the harms of the preferred route could be avoided, the landowner considers that National Grid will face real difficulties in any future examination for the North Humber to High Marnham Project. For example, the landowner anticipates that it will argue as part of that examination that (a) there has not been an adequate exploration of reasonable alternatives to compulsory acquisition of the land which will be required to facilitate that project; (b) that the impacts of the exercise of compulsory purchase powers for that project and the compensation which would arise have not been minimised in the public interest; and (c) the case is one where it is relevant and necessary to consider whether there is a more appropriate site elsewhere and where the evidence plainly weighs in favour of a more appropriate alternative route.
15. All of this means, therefore, that, in the landowner's submissions, the Applicant is entirely right to resist the imposition of protective provisions in the DCO for future assets which may come forward as part of the North Humber to High Marnham Project. There are very real concerns about National Grid's currently preferred route, and it is not at all clear that it will survive examination given the very real and robust challenge which, if pursued any further, the landowner intends to make. It is very likely that others, such as the Applicant, will equally do so.

CONCLUSION:

16. Thank you.



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