

26 March 2026

FAO Case Manager
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Dear Tim,

APPLICATION REFERENCE: EN0110013 THE DROVES SOLAR FARM

Thank you for the Examining Authority's letter dated 17 March 2026 issued under section 89(3) of the Planning Act 2008, requesting '*that the applicant provides an assessment of the implications for delivery of the proposed development and how the application should be examined, including the Order Limits*' following receipt of National Grid Electricity Transmission (NGET) Plc's Relevant Representation [\[RR-036\]](#) in relation to the application for a Development Consent Order (DCO) (the DCO Application) for The Droves Solar Farm (the Scheme).

Background

Island Green Power UK Limited (IGP), as the parent company of The Droves Solar Farm Limited (the Applicant), has been working on grid connections with NGET since 2018.

Whilst in dialogue with NGET in 2022 regarding the potential to connect into the King's Lynn substation, IGP were advised by NGET to apply for, and subsequently connect, directly onto the overhead line (OHL) running between the King's Lynn and Necton substations. The reasoning for this was understood by the Applicant to be a lack of available space for the infrastructure required to connect into either of these existing substations.

At the pre-application stage of the Scheme, however, the Applicant was advised by NGET that it would be responsible for identifying a site for a new substation for the Scheme (the National Grid Substation), alongside obtaining land rights and planning consent for this.

The Applicant undertook a site search for the location of the National Grid Substation, drawing upon guidance from NGET¹ to inform this process. This resulted in the identification of the least constrained land along the OHL between the King's Lynn and Necton substations. More detail on the site evaluation approach is included within Appendix 1 Site Evaluation Report to the Planning Statement [\[APP-043\]](#).

The Applicant notes that NGET does not state, in its Relevant Representation [\[RR-036\]](#), that the proposed location for the National Grid Substation is unviable. Indeed, the Applicant's expectation is that NGET will determine that the proposed location for the National Grid

¹ Guidelines on Siting and Design: <https://www.nationalgrid.com/document/346731/download>

Substation is suitable (given the Applicant's site selection methodology being akin to NGET's site selection process).

The grid connection offer received from NESO identifies the connection of the Scheme to the OHL via a new 400kV substation, referred to as 'New Swaffham 400kV Substation' (i.e. the National Grid Substation). Appendix I ("User's Works") of the construction agreement contained within the grid connection offer states that the User (being the entity applying for the grid connection, i.e. the Applicant) has responsibility to "obtain land and consent for the Relevant Transmission Licensee Works", with NGET being defined as the Relevant Transmission Licensee.

There is no requirement in the grid connection offer for the Applicant to seek approval for the location of the National Grid Substation from NGET. Appendix J ("Construction Programme") of the construction agreement contained within the grid connection offer states that the User must apply for planning consent by 30 March 2027 and inform NGET of the location of the substation by 28 February 2028.

The Applicant has had, and continues to have, regular monthly meetings with representatives from NGET and NESO; these meetings commenced before the grid connection application was submitted. It is standard practice that these meetings are the primary mechanism by which Users, NESO and NGET keep each other updated on progress, including the location of sites and substations. As part of this engagement process, the Applicant shared the proposed location of the National Grid Substation with NGET. It is for NGET's attendees at those meetings to coordinate the distribution of this information internally.

In addition to these meetings, NGET introduced a 'portal' whereby certain documents can be uploaded. The Applicant sent confirmation of the land rights it had secured for the proposed location of the NGET Substation to NGET in August 2024 and later uploaded copies of the relevant documents to the portal in July 2025.

NGET's Relevant Representation [\[RR-036\]](#) states:

"NGET wish to note, however that NGET are not currently developing proposals to build a new substation within the Project's order limits. The location of the new substation is still to be confirmed with siting studies to be reviewed post Connection Reform, and therefore maybe sited in a different location, NGET is unable to confirm the connection point at this stage.

NGET urges the Applicant to confirm, in their connection agreement with NESO, the connection point. This is essential to avoid ambiguity and ensure that all parties' statutory and operational requirements are met."

NGET notes that it is "*not currently developing proposals to build a new substation within the Project's order limits*". The Applicant agrees with this statement and notes, as stated above, that the responsibility for developing the proposals for the National Grid Substation is currently placed upon the Applicant. NGET's reference to "*post Connection Reform*", in the opinion of the Applicant, would mean that NGET would not be reviewing the proposed location for the National Grid Substation until mid-late 2027 (possibly even later than that,

given that most of the key Connection Reform published timelines have not been adhered to so far in the industry). This timeframe would conflict with the Applicant's contractual and time-stamped obligations stated above (i.e. to apply for planning consent by 30 March 2027 and inform NGET of the location of the National Grid Substation by 28 February 2028). Until NGET or NESO confirm otherwise, these contractual documents comprising the Applicant's grid connection offer for the Scheme remain binding, meaning the Applicant is contractually obligated to meet the milestones within.

The Applicant wishes to reiterate that it has:

- complied with its contractual obligations to "obtain land and consent" for the National Grid Substation under the terms of the grid connection offer;
- provided the proposed location of the National Grid Substation to NGET;
- provided confirmation of the requisite land rights to NGET;
- been in frequent and regular dialogue with NGET since 2022; and
- consulted NGET on the DCO Application (i.e. which would consent the National Grid Substation in the proposed location).

On a wider note, the Applicant considers that the continuing delays caused by the Connection Reform should not cause corresponding delays to the planning process, and notes the following points:

- Grid connection offers contain contractual deadlines for applying for and securing corresponding planning consents, so these consent applications must be able to progress in order to maintain valid grid connections;
- Connection Reform prioritises projects that are further progressed; therefore, contractual milestones pertaining to land rights and planning consent are recognised and rewarded when processing the queue of projects; and
- If the planning process is delayed until the Connection Reform is complete, in the hope of achieving more certainty about the grid connection status of various projects, but simultaneously a project is ranked lower in the queue of projects during the Connection Reform for not progressing its planning consent (or, indeed, that project's grid connection offer is rescinded for missing milestones), then development will grind to a halt in the UK until the two can be decoupled.

Implications for Delivery

As stated above, the Applicant's expectation is that NGET will determine that the proposed location for the National Grid Substation is suitable (given the Applicant's site selection methodology being akin to NGET's site selection process). However, the Applicant retains the ability to separately seek consent for the grid connection from the Customer Substation to the National Grid Substation in the unlikely event that NGET subsequently decides that they would prefer to site the National Grid Substation elsewhere.

If NGET were to make this unexpected decision, the actions to be taken by the Applicant would be dependent on timing.

1. **During examination.** It is possible that NGET will undertake its site selection exercise for the National Grid Substation during the course of the examination, and may at that

time confirm that their preference is for the National Grid Substation to be located elsewhere than currently identified by the Applicant. In this scenario, and to the extent that the works required to facilitate the connection between the Customer Substation and the National Grid Substation will be consented separately, the Applicant would update its environmental information, pertaining to the DCO, to cumulatively assess the relevant works depending on the new proposed location (e.g. by submitting an addendum to the Environmental Statement in this regard). It is acknowledged that the provision of such information could trigger the need for further consultation under the Planning Act 2008 and associated Regulations, in accordance with the Government's Guidance on Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination. However, this will be dependent on whether any new or materially different cumulative environmental effects are identified.

2. **Post-consent.** Similarly, if NGET do not confirm their preferred location for the National Grid Substation until the consent for the DCO has been granted, then any future consent application (whether as a change to the DCO or a separate planning application under the Town and Country Planning Act 1990) for the connection from the Customer Substation to that National Grid Substation would cumulatively assess that application with the works consented under the DCO. This will ensure there is no 'gap' in the assessment of environmental effects, and could include the production of a new Environmental Statement for the separate connection application.

It is an established principle that an applicant is not required to deliver a connection to a generating station as part of a DCO application for that generating station, provided that a connection agreement is in place. In other words, it is not a barrier to granting consent for a generating station if the point of connection is not yet identified or consented.

Indeed, this is an approach which is recognised and provided for within Section 4.11 of the Overarching National Policy Statement for Energy (NPS EN-1) 2023 (which is part of the suite of NPS that this DCO Application will be examined in accordance with). NPS EN-1, at paragraph 4.11.7, encourages applications for new generating stations and related infrastructure to be contained in a single application or in separate applications submitted in tandem where possible, but paragraph 4.11.8 acknowledges that there will be instances where this is not possible (e.g. in the scenarios presented above). In such instances, paragraph 4.11.8 states that applicants should explain the reasons for the separate applications (which the Applicant would do, if such a situation arose), including information on the elements to be consented separately to the extent they are available (which the Applicant would provide, if such a situation arose). Importantly, footnote 160 to paragraph 4.11.8 acknowledges that 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.

Further, paragraphs 2.7.2-2.7.4 of the NPS for Electricity Networks Infrastructure (NPS EN-5) 2023 also recognise this approach to consenting.

As set out above, the Applicant has a grid connection offer for the Scheme requiring it to secure consent and land for the point of connection. The Applicant's approach and methodology is, therefore, sound – consent is being sought for the National Grid Substation in a location that the Applicant considers suitable based on NGET's criteria. Consent for the

potential National Grid Substation in this location should therefore be fully examined, and NGET will then have the option to carry out the works should NGET determine that the proposed site for the National Grid Substation is suitable. However, in the event that NGET indicates a preference for an alternative location (at whatever stage in the process), the Applicant retains the ability to seek a separate consent (with updated environmental information and assessment) for the connection to the National Grid Substation as a result.

DCOs have been granted for a number of generating stations where the connection works have been consented separately. These include the Hinkley Point C (Nuclear Generating Station) Order 2013, the Triton Knoll Offshore Wind Farm Order 2013 (and the subsequent Triton Knoll Electrical System Order 2016), the Morgan Offshore Wind Project Generation Assets Order 2025 and the Morecambe Offshore Windfarm Generation Assets Order 2025.

The Applicant also notes that discussions on similar issues have been raised in relation to the examinations of other recent DCOs, including some solar DCOs. Without wishing to repeat lengthy submissions of which the Planning Inspectorate and Secretary of State will be aware, the Applicant briefly addresses these in turn.

Five Estuaries

During the examination of the DCO for the Five Estuaries Offshore Wind Farm, there was a similar discussion regarding the Norwich to Tilbury project, during which the local planning authorities sought a Grampian-style requirement stating that the Five Estuaries project could not commence until NGET had obtained consent for the Norwich to Tilbury project. The Secretary of State was not persuaded by this argument, and did not include such a requirement in the made DCO for the Five Estuaries project (despite the fact that, when the DCO examination for the Five Estuaries project closed, the corresponding DCO application for the Norwich to Tilbury project had not yet been submitted, meaning there was no certainty as to the location of the grid connection infrastructure available at that time). The Applicant refers to the Opinion of Hereward Phillpot KC² submitted in relation to this matter, particularly paragraphs 15 and 16 of that document.

This is a comparable example of the basis for the Applicant's confidence in its position that it is not a barrier to granting consent for a generating station if the point of connection is not yet fully known (given the Applicant has a grid connection offer from NESO).

Botley West

During the examination of the DCO for the proposed Botley West Solar Farm, NGET noted in its Relevant Representation that "*the Project has allowed for the Farmoor substation in its proposals within work number 1 and parcel number 13-04 however this is not the NGET preferred location for this substation*". It was clarified by the solicitors for the applicant that "*until National Grid provides definitive confirmation that it can deliver the proposed substation on land within its existing control, the Applicant must retain the consent powers for the new National Grid substation*". They did, however, refer to the fact that whilst "*no prioritisation has been communicated [with NGET], a point of connection and a formal*

² <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-001452-Five%20Estuaries%20Offshore%20Wind%20Farm%20Ltd%20-%20Any%20other%20submission%20from%20the%20Applicant%204.pdf>

connection agreement are already in place and therefore there is a contractual obligation to meet the connection date". They also stated that *"the absence of detailed information from National Grid regarding the application or routing for the proposed substation is not an impediment to the project. The Applicant is seeking to include consenting powers for the National Grid substation within the dDCO. The Applicant therefore seeks a comprehensive consenting package that ensures both the delivery of the Project and the substation, in line with the existing connection agreement, irrespective of National Grid's own delivery timeline"*³. This is a similar set of circumstances that the Applicant faces for the proposed DCO for the Scheme.

Further, the Examining Authority queried whether the applicant would consider the inclusion of a Grampian clause in the DCO that would effectively prevent compulsory acquisition or the commencement of the development until planning permission is granted for that National Grid substation on NGET's land, if being delivered outside of the Order limits. The applicant responded that it included fallback consenting powers within the DCO to ensure that the delivery of the project is not impeded should NGET be unable to deliver its substation. Regarding a Grampian clause, this was concluded to be unnecessary – other consented projects have not included such provisions, as certain works must proceed to maintain project certainty. For Botley West, it was highlighted that given the fact that the project was in its examination stage, alongside the typical five-year implementation period being sought, there was sufficient time for NGET to finalise its proposals. For the DCO for the Scheme, the Applicant is at an even earlier stage of the process, given the examination has not yet begun. It was concluded that imposing a Grampian clause could introduce unnecessary risk and deter investment⁴.

Springwell

During the examination of the DCO for the proposed Springwell Solar Farm, there was discussion regarding the fact that NGET were planning to submit a planning application for the Navenby substation (which this project proposed to connect into) at a later date, and that the entirety of the field in which the substation was proposed to be located had been included in the applicant's order limits. The applicant in that case argued that given NGET were currently designing the substation and the exact location of the point of connection was to be confirmed, as the NGET design progressed, the applicant therefore needed to include the full area included within the order limits to ensure it had the necessary authorisation and powers to connect into the substation.

It was also agreed that the applicant was negotiating protective provisions with NGET, which would be expected to include controls over the applicant's ability to exercise compulsory acquisition powers with respect to interests held by NGET, and also require NGET's approval of the applicant's works in the vicinity of NGET assets or interests. In this way, NGET would have the necessary comfort in terms of potential impacts from the applicant having the powers in the DCO in this area, in particular with respect to the delivery of Navenby substation.

³ Post-Hearing Note for Issue Specific Hearing 1 of the Botley West Solar Farm: [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010147-001012-11.3%20The%20Applicant%27s%20Written%20Summary%20of%20its%20oral%20submissions%20at%20Issue%20Specific%20Hearing%201%20\(on%20DCO%20and%20Strategic%20Matters\).pdf?a=1](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010147-001012-11.3%20The%20Applicant%27s%20Written%20Summary%20of%20its%20oral%20submissions%20at%20Issue%20Specific%20Hearing%201%20(on%20DCO%20and%20Strategic%20Matters).pdf?a=1)

⁴ There is also further rebuttal of the need for a Grampian clause at PC001 on pages 3-5 of the [Applicant's Response to the ExA's Schedule of Changes to dDCO](#) for the Botley West project.

The Applicant has included protective provisions on the face of the draft DCO for the Scheme for the benefit of NGET. The Applicant will be seeking to agree the protective provisions and any associated side agreement with NGET during the examination and is confident that agreement will be reached.

North Falls

During the examination of the DCO for the North Falls Offshore Wind Farm, there was discussion around the fact that the project was being pursued independently of the Norwich to Tilbury project, which comprises the creation of the new East Anglia Connection Node (EACN) and which the North Falls project would use to connect to the grid, if consented. Here, it was noted that the North Falls project *“is being pursued independently of the Norwich to Tilbury project and will be developed even if the Norwich to Tilbury project does not proceed. The Applicant has signed a connection agreement with NESO and the delivery of that connection is a matter for NGET and NESO (either through the Norwich to Tilbury project or via some alternative approach as NGET sees fit)”* and that the powers sought over the relevant plots *“are necessary and proportionate as it is not yet known where within these plots National Grid Electricity Transmission’s (NGET) East Anglia Connection Node (EACN) substation and its ancillary items e.g. attenuation ponds will be located, nor the details of the proposed connection point, save to say it is proposed somewhere within these plots. The Applicant therefore requires the flexibility to locate and facilitate a connection between the NFOWF onshore substation and any point that NGET determines within these plots”*⁵.

By confirming that the North Falls project could connect to the grid via an alternative means, if development consent for the EACN substation is not granted as part of the Norwich to Tilbury project, the applicant highlighted the standard principle that a generating project can be expected to be ahead of a connection project, in relation to consenting timescales. Similarly to the analysis highlighted above in relation to Botley West, it was also noted that a Grampian requirement *“would mean that the Project could not be developed if the EACN was not consented which is a completely unreasonable outcome as it does not allow for another connection option to be provided by NGET”*⁶.

Rosefield

During the examination of the DCO for the proposed Rosefield Solar Farm, NGET raised the point that a proposed new substation would replace the existing substation in the area, to which the project would connect, and the Examining Authority asked for clarity that the project would not prevent the delivery of the replacement substation, given that the applicant included NGET’s operational land (including the compulsory acquisition of rights) for the existing substation within its order limits.

The applicant responded that the final location and timing of the works for the replacement substation had not yet been confirmed by NGET, so the project design included flexibility to account for a connection into either the existing substation or NGET’s preferred location for

⁵ [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010119-000870-9.19%20Applicant%27s%20Response%20to%20Written%20Questions%20\(ExQ1\)%20\(Rev%200\).pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010119-000870-9.19%20Applicant%27s%20Response%20to%20Written%20Questions%20(ExQ1)%20(Rev%200).pdf)

⁶ [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010119-001503-9.99%20Applicant's%20Response%20to%20ExA%E2%80%99s%20Third%20Written%20Questions%20\(ExQ3\)%20\(Rev%200\).pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010119-001503-9.99%20Applicant's%20Response%20to%20ExA%E2%80%99s%20Third%20Written%20Questions%20(ExQ3)%20(Rev%200).pdf)

the replacement substation. Again, it was noted that the negotiation of protective provisions, to address NGET's concerns, were ongoing – indeed, NGET stated that an agreed form of protective provisions “*will put in place appropriate protections such that the delivery of the replacement [substation] is not prevented*”⁷.

Therefore, there is precedent (and policy) for the Applicant's approach.

Examining the Application

For the reasons set out above in this letter, the Applicant intends to proceed with the DCO Application as currently proposed.

The DCO Application is seeking consent for, but not an obligation on NGET to deliver, the National Grid Substation in the proposed location. The fact that this location has not yet been confirmed by NGET does not prevent the Applicant from seeking development consent for it as an option. If NGET decides to locate the NGET Substation in another location, then consent can be obtained for the connection works separately.

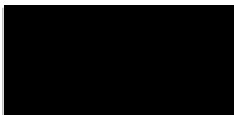
Further, the Applicant notes that any powers of compulsory acquisition can only be exercised for the purpose for which they are originally sought. Therefore, if NGET decides to locate the National Grid Substation at an alternative location to the land over which the Applicant has sought the necessary compulsory acquisition powers in relation to it, the Applicant could not lawfully exercise those powers over that land.

The Applicant is not seeking to delay the commencement of the examination of the Scheme and therefore considers that the Preliminary Meeting can be held as soon as possible.

The Applicant also wishes to note that it will continue to discuss the National Grid Substation during its regular meetings with NGET and NESO.

I would be grateful if you would please acknowledge safe receipt of this letter and the enclosed documents.

Kind regards,



Harman Sond

Project Development Manager – Island Green Power

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<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010158-000435-Final%20NGET%20response%20to%20ExA%20RfI.pdf>