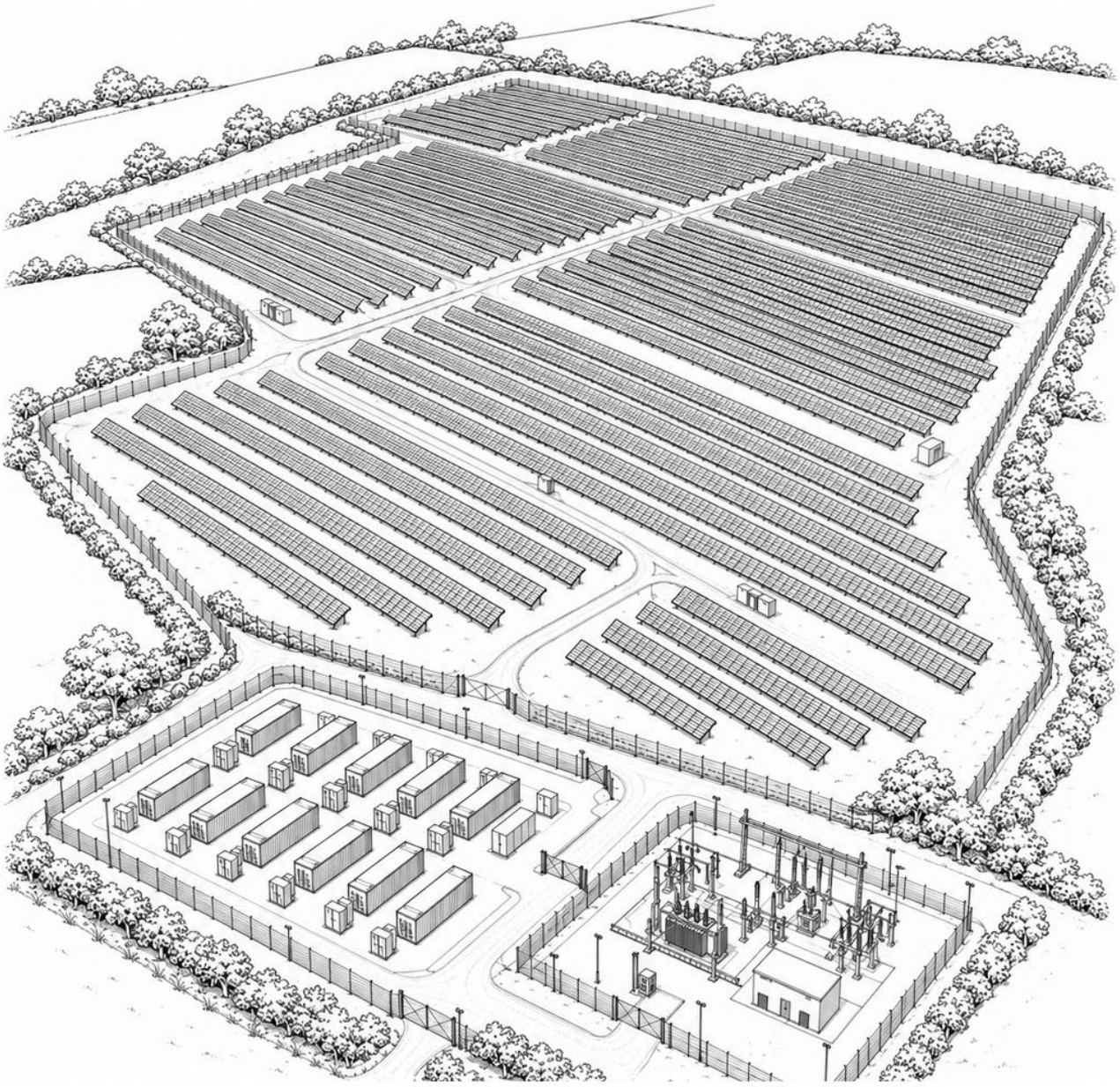
# Supplementary Objection to East Pye

## Development Consent Order (DCO) Case No. EN0110014



Local Resident
Interested Party Ref [redacted]
27th October 2026

**Introduction**

This note accompanies the correspondence of National Grid Electricity Transmission plc (NGET), dated 20 October 2026 (EIR 234), and National Energy System Operator (NESO), dated 19 October 2026 (FOI/26/225). Appendices 1 and 2 and my request to both organisations requesting an internal review of their responses 27.10.26. It is offered as supplementary evidence, subject to the Examining Authority's (ExA's) permission to accept late submissions. It does not replace my original objections or the source letters (which in any case, NGET and NESO have both replicated in their response).

## 1. Purpose, scope and evidential approach

My objections concerning the possible proliferation of electricity generation and storage infrastructure, the cumulative consequences of a new Great Moulton transmission node and a possible Norwich Main–Great Moulton–Yaxley energy corridor prompted two complementary requests under the Environmental Information Regulations 2004 (EIR). I acknowledge the distinction between matters established by the responses, reasonable inferences and hypotheses requiring examination. The requests themselves prove no proposition about future projects.

There is also an immediate matter independent of any future energy hub: whether the 400 kV substation and transmission connection upon which East Pye depends are sufficiently settled, consentable and environmentally assessed within the development now before the ExA.

## 2. My two assertions and why I requested evidence

Assertion 1 - potential strategic overprovision (NGET). The proposed Great Moulton 400 kV substation may have a physical scale, configuration, connection capability or future expansion provision exceeding what East Pye alone requires. This is a hypothesis, not an allegation of unjustified engineering. Operational resilience, efficient network configuration and futureproofing may be sound explanations; the distinction should nevertheless be made transparent.

Assertion 2 - project geography and the connections pipeline (NESO). NESO may hold recorded information beyond the public TEC Register concerning where prospective generation and storage projects would be physically located and their intended connection arrangements. The register's connection-site name is not a site plan. Some proposals may not proceed; others may have sufficiently developed locations to inform a proportionate cumulative assessment.

The requests therefore address the potential supply of connection infrastructure (NGET) and prospective demand for it, including geographic consequences (NESO). They are complementary, not interchangeable.

## 3. What has been disclosed and what remains unresolved

| Subject | NGET: 20 October 2026 | NESO: 19 October 2026 | Examination significance |
|---|---|---|---|
| Connection agreement | East Pye offered "Long Stratton 400 kV"; typical 500 MW customer connection needs one bay. | TEC Register records contractual connection sites supplied by Transmission Owners. | The contractual designation does not fix a physical substation or layout. |
| Substation site/design | No agreed DCO location/design; NGET says it would not construct at the location shown. No preferred alternative. | Does not design/own the infrastructure. | Deliverability, land limits, alternatives and assessment require reconciliation. |
| Other users | Will not design solely around East Pye to disadvantage future customers; no completed customer bay allocation. | Holds information in scope; surviving listed schemes Gate 1; further geography withheld. | No proof of committed multiple connections, but potential multi-user assumptions remain untested. |
| Node identification | Cannot confirm Node A, Long Stratton and DCO location are one physical asset. | States TO advises contractual connection site. | Physical/electrical mapping of designations is indispensable. |
| Environmental assessment | No separate NGET cumulative assessment identified. | Location information withheld under EIR 12(5)(e). | Applicant must justify its assessment and explain exclusions/uncertainty. |

*Sources for the table: NGET EIR 234, Answers 1–12, pp. 1–4; NESO FOI/26/225, pp. 2–5. A "no information held" response, when accurate, does not require NGET to create a new study under the EIR; it also does not answer whether the DCO evidence is sufficient.*

## 4. North Anglia Connection Node A, Long Stratton and Great Moulton: a material unresolved identity question

NGET's Answer 4 confirms that its records describe East Pye's offered connection as "Long Stratton 400 kV" but that it cannot confirm that "North Anglia Connection Node A", "Long Stratton" and the substation depicted in the East Pye DCO are the same physical asset. It states that the physical DCO site and layout have not been agreed and would not be constructed as shown. NESO in turn states that the Transmission Owner advises the connection designation appearing in NESO's offer and TEC Register. A public contractual name is therefore not a verified physical point or fixed geographical location.

The uncertainty could have at least three explanations: (i) the terms describe one future site under differing names; (ii) they describe different nodes or voltage-specific facilities which may or may not be physically co-located; or (iii) some terms are provisional contractual/network labels whose physical implementation has yet to be determined. It would be unsound either to count every label as a separate substation or to treat them as confirmed synonyms.

| Question to resolve | Reason it matters |
|---|---|
| Are Node A 400 kV, any Node A 132 kV designation and Long Stratton 400 kV the same or different electrical nodes? | Potential number and character of substations, possible distribution interface and future physical footprint. |
| What geographic/electrical relationship exists among Norwich Main, Great Moulton/Long Stratton, Node A and Yaxley? | Basis for the proposed energy-corridor scenario and associated network modifications. |
| For each relevant TEC entry, which connection node is offered and is it provisional? | Avoids assuming that projects with local-sounding names necessarily rely on the East Pye node. |
| Which circuits, busbars, transformers and associated works would each arrangement require? | Tests the Rochdale Envelope, overhead-line changes, land take and worst-case landscape effects. |
| Would a solution outside Work No. 4A or the Order limits be required? | May entail a distinct consent route, assessment, consultation and programme. |

I invite the ExA to seek a jointly reconciled, appropriately redacted single-line electrical schematic and geographic plan from NGET and NESO, showing the current contractual labels, existing and proposed physical nodes, voltage levels, relevant circuits and the position of East Pye's Work No. 4A. The drawing should distinguish confirmed facts from possible configurations and show what cannot yet be determined. If customer identities cannot be disclosed, an anonymised node-level explanation would still have substantial value.

## 5. A mismatch between the 2023 connection agreement and the DCO proposal

The East Pye Grid Connection Statement (APP/7.12) records a June 2022 application, an October 2022 offer and a July 2023 bilateral connection agreement with NESO for 500 MW export/import, following engagement with NGET. It also presents the new substation and related works in the DCO, with NGET expected to design, construct, own and operate the transmission assets. A bilateral connection contract is not the same as an agreed engineering drawing, and this distinction should I feel be accepted.

Nevertheless, NGET's October 2026 response says it has not agreed the location or design, would not construct the substation at the location shown, is still considering alternatives and has no settled overhead-line turn-in. The ExA should seek a documented chronology of exchanges since 2022/2023, including what NGET actually accepted when the applicant finalised its DCO parameters, whether any position has changed, and whether "location shown" refers to an illustrative positioning, the whole of Work No. 4A or the wider area.

## 6. Rochdale Envelope: legitimate flexibility and its limits

Current Planning Inspectorate EIA guidance recognises that the definitive location of an onshore substation/grid connection point can sometimes remain flexible. Such flexibility requires sufficiently defined parameters and an assessment of the likely significant effects of the reasonable worst case. It is not reasonable to move essential development outside the permitted limits or leave material impacts unassessed.

| Potential change | Is this likely to be within an appropriately assessed envelope? | Necessary ExA scrutiny |
|---|---|---|
| Equipment orientation or internal switchgear arrangement | Potentially, where maximum dimensions and effects are secured. | Height, noise, visual receptors and operational risk. |
| Relocation within Work No. 4A | Potentially, not automatically. | Environmental effects vary by position and land constraints. |
| New or relocated towers / changed overhead-line turn-in | Only if works and worst-case effects are authorised and assessed. | Line routes, tower heights, access, ecology and landscape. |
| Larger compound/additional land or facilities | Not automatically. | DCO order limits, land powers, project description and effects. |
| Substation at a different site outside Order limits | Not through the existing envelope alone. | Separate consent or change procedures and cumulative assessment. |
| Future customer expansion | Depends what is authorised and assessed. | Differentiate present build from speculative later works. |

The ExA should require the applicant and NGET to identify whether the scheme NGET is realistically likely to build falls within the authorised and assessed envelope, not simply that future detailed design can be resolved after consent.

## 7. Potential future connections, engineering necessity and confidentiality

NGET says that it would not design a new site solely for East Pye in a way that prejudices future customers. That is not itself evidence of an undisclosed queue of deliverable developments or strategic overprovision. But it warrants a counterfactual question: would NGET select materially different land, bays, busbars or overhead-line arrangements if East Pye were the only future customer? If so, which requirements arise from resilience, generic futureproofing, wider network plans or identifiable prospective connections?

NGET mainly relies on EIR Regulation 12(4)(a) because specified studies and detailed records have not been prepared. NESO acknowledges holding geographical information within scope but withholds additional details under Regulation 12(5)(e). These are legally different positions. The organisations also refer to one another: NGET directs connection-contract status to NESO, while NESO says the Transmission Owner identifies the connection site. The result is an evidential gap: I do not contend this is proof of deliberate circular evasion.

Commercial confidentiality can be legitimate, including during land negotiations. The ExA should nevertheless examine whether less precise, non-identifying information could reveal an environmental pattern without disclosing commercially sensitive details. A lawful EIR refusal does not in itself obviate the need for a DCO environmental assessment.

## 8. Further concerns arising from the NGET response

| NGET answer | Concern | Focused clarification |
|---|---|---|
| 2 | No completed NGET appraisal of sites/configurations. | What alternatives did the applicant assess and on what engineering evidence? |
| 6–7 | No agreed boundary/layout or confirmation that DCO land and powers suffice. | Can essential construction and operational works fit within Order limits? |
| 8 | No settled programme; possible later Town and Country Planning Act application. | What is the delivery sequence and relationship between consent routes? |
| 1, 7 | Double-circuit turn-in is a normal NGET preference but not yet designed. | What line diversions/towers are needed and which alternatives have been assessed? |
| 9–10 | No completed multi-user/132 kV/UKPN arrangement. | Is a distribution interface or wider operational function being safeguarded? |
| 11 | No separate NGET cumulative assessment. | How has the applicant accounted for NGET works and reasonably foreseeable projects? |

## 9. Project status and proportionate cumulative assessment

NESO confirms that RPC Elmya Gissing (PRO-004657) is terminated and had appeared erroneously in the register in October 2026. This project should not be treated as a current live connection entry. The response describes the other listed entries as Gate 1 where they currently appear. Gate 1 is not planning permission, proof of an implementable scheme or proof of reliance on a single Great Moulton substation.

The ExA could distinguish developments with publicly established geography, proposals with less defined but recorded locations, and wholly hypothetical developments. The evidence might support assessment of some identified projects, qualified geographical scenarios for others, and explicit exclusion of those too uncertain to assess meaningfully. It should walk the line between an assumption that every TEC project will proceed and the opposite assumption that commercial confidentiality renders all spatial consequences irrelevant.

## 10. Procedural options that appear open for the ExA

| Option | Possible examination action | Purpose |
|---|---|---|
| Written questions | Questions to applicant, NGET and NESO on scope and extent of agreement. | Identify gaps and points of dispute. |
| Coordinated network evidence | Single-line diagram and location map reconciling Node A/Long Stratton, status and voltage levels. | Establish node identity and plausible physical works. |
| Technical comparative evidence | East Pye-only configuration versus preferred/possible wider-capacity solution. | Test strategic overprovision assertion. |
| Proportionate spatial information | Ward/parish/area bands or other suitable aggregation, if held and lawfully shareable. | Test future development geography. |
| Issue-specific hearing | Question NGET and applicant on alternative siting and programme. | Test whether proposed DCO works are deliverable. |
| Further assessment | Targeted ES clarification, relevant reasonable scenarios or additional assessment where justified. | Address significant effects within legal assessment scope. |
| Report unresolved uncertainty | Explain implications if essential uncertainties remain. | Inform Secretary of State's decision. |

The ExA's ability to compel disclosure from third parties is not unrestricted, particularly if NGET or NESO are not participating interested parties in the Examination. The applicant can

nevertheless be asked to reconcile its scheme with the intended owner/operator and to justify the completeness of the Environmental Statement. I do not invite the ExA to adjudicate upon my EIR internal reviews.

## 11. Summary of my requests to the ExA

1. A joint applicant–NGET statement identifying all substantive agreements, differences and changes in position since the 2022 offer and 2023 bilateral agreement, especially the status of Work No. 4A and proposed overhead-line turn-in.
2. A reconciled network schematic and map addressing North Anglia Connection Node A (including voltage-specific variants), Long Stratton 400 kV, the DCO substation, Norwich Main and Yaxley, identifying confirmed, provisional and distinct assets.
3. A reasoned statement of whether the NGET infrastructure actually likely to be built lies within DCO limits, available powers and the reasonable worst-case Environmental Statement; if not, the likely alternative consenting path and relationship with the East Pye DCO.
4. A comparison of the East Pye-only technical requirements with the possible preferred network configuration and the reasons for any additional provision, without assuming that future customer provision is unjustified.
5. Clarification from NESO of the connection status and categories of physical location information held for relevant projects, including consideration of lawful partial, anonymised or less precise disclosure.
6. A transparent explanation of the cumulative development screening methodology, including treatment of Gate 1 projects, publicly identifiable sites, unidentified projects and relevant scenario testing.
7. A delivery and consent dependency statement explaining responsible organisations, programme interfaces, contingencies and how any future NGET assessment would be coordinated with the DCO.

## 12. Conclusion and evidence references

I am not asking the ExA to adopt my hypotheses about overprovision, the emergence of a Great Moulton energy hub or an energy corridor. I am asking it to distinguish the immediate uncertainty about infrastructure essential to East Pye from questions about reasonably foreseeable future projects, and to test both with proportionate evidence before reaching its conclusions. The EIR responses disclose enough uncertainty to warrant direct clarification, but do not on their own establish that the application is invalid or that other projects will proceed.

## Appendix 1 – NGET EIR Response 20.10.26

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20 October 2026

[redacted]
Rob Shipway

Dear Rob,

**EIR 234**

**Environmental information request**

Thank you for your information request we received on 18th August 2026. This request is being answered on behalf of National Grid Electricity Transmission plc (NGET). We wrote to you on 15th September 2026 extending the request by a further 20 working days up to 14th October 2026. We sent an email to you on 14th October 2026 explaining that NGET required more time to consider the request.

Your request has been considered under the Environmental Information Regulations 2004 (EIR) as we believe that the information requested falls within the definition of environmental information as set out in Regulation 2(1) of the EIR.

**Information requested**

The information request is included in Appendix 1.

**Our response**

We provide a response to each of your questions and numbered requests as set out below.

1. *Identity, purpose and specification*

NGET has not specified or agreed a substation at the location shown in the East Pye DCO and does not hold a design for that site. The point of connection offered to East Pye was "Long Stratton 400 kV", but the site has not been developed. A typical 500 MW connection would require one customer bay. Because there is no available capacity at an existing substation, a new substation would need to be triggered. NGET's normal preference for a new substation would be a double-circuit turn-in, requiring modification of the overhead-line route, but no turn-in or overhead-line design has yet been reviewed or completed. No responsive records are held for the requested detailed configuration, reasons, wider function or comparison of minimum and maximum layouts; Regulation 12(4)(a) therefore applies to those elements.

In response to item 1(d), as at the date of your request NGET has not specified or required a double-busbar arrangement for this connection. No site-specific layout or busbar configuration has

been agreed or designed as at the date of your request. Accordingly, no information is held by NGET on this item. Regulation 12(4)(a) of the EIR accordingly applies.

In response to item 1(e), no turn-in design or overhead-line design has been reviewed or completed for this connection as at the date of your request. Accordingly, no information specifying, requiring, or recording reasons for a specific turn-in configuration is held. Regulation 12(4)(a) applies.

2. *Connection and location alternatives*

NGET is considering alternative options and has not selected a preferred option or location. The work is still in an optioneering phase and we have not reviewed or designed the listed alternatives, including busbar, switchgear, footprint, route or alternative-node options. NGET therefore holds no completed option appraisal or decision record answering the detailed points in this section. Regulation 12(4)(a) applies to the information requested.

3. *Capability, expandability and safeguarded provision*

Apart from the general indication that a typical 500 MW connection would use a single customer bay, no site-specific layout, bay schedule, ultimate-development drawing, electrical-capability assessment, 132 kV provision or safeguarded expansion plan has been prepared by NGET. The East Pye applicant's published assumptions are not an agreed NGET design. Regulation 12(4)(a) applies to the information requested.

*4. Node A and Long Stratton designations.*

NGET's records identify East Pye's offered point of connection as "Long Stratton 400 kV". NGET has not developed a site and cannot confirm that North Anglia Connection Node A, Long Stratton and the location shown in the East Pye DCO are the same physical asset. The DCO substation location and layout have not been agreed with NGET and would not be constructed as shown. The NESO connection registers are the authoritative public source for current contractual connection-site designations; they do not by themselves establish a final NGET site or detailed physical relationship. No further recorded analysis answering points (a)–(g) is held.

*5. Other projects and connection interests.*

Contractual connection information is administered by NESO and current public information is published in the TEC Register. Customer-specific contractual status should be taken from NESO's current register and any signed agreement. Information about unsigned offers should not be treated as public merely because an offer has been issued.

NGET will not design a site solely for East Pye and holds no completed allocation of bays, land or physical provision against the listed projects, nor a settled assessment of their dependency on the DCO location. To the extent no additional NGET record is held, Regulation 12(4)(a) applies. Any held customer information considered for disclosure must be assessed document by document, including Regulation 12(5)(e) where commercial confidentiality is established, and Regulation 13 for personal data.

*6. Locations, land and confidentiality.*

NGET has not selected or developed a substation site and therefore does not hold an agreed NGET boundary, route or site plan for disclosure.

*7. East Pye DCO land, powers, agreements and delivery dependency.*

The substation shown in the East Pye DCO has not been agreed with NGET and NGET would not construct it at the location shown. NGET therefore has no agreed current or ultimate layout against which the sufficiency of the DCO land and powers can be confirmed. Matters of location, layout, access, turn-in, equipment, programme and delivery remain subject to siting, design, approvals and the applicable consenting route. No recorded contingency answering the remaining questions is held; Regulation 12(4)(a) applies.

*8. Present design, programme and decision status.*

As at the date of the request, NGET had no preferred site and was not at detailed-development stage. The matters listed are not approved or fixed and alternative options are currently being explored. If NGET brings forward a site, it is expected to require an application under the Town and Country Planning Act to the relevant local planning authority, with consultation and stakeholder engagement. No detailed milestone programme or consequence assessment of the kind requested is held.

*9. Permanent and strategic network role.*

No final asset, site or configuration has been selected, so NGET has not determined the permanent post-East-Pye function, removal mechanism, multi-user role or relationship with wider East Anglia works. NGET's present position is that a site should not be developed solely around one customer in a way that disadvantages potential future customers or consumers; however, no completed strategic assessment answering points (a)–(g) is held. Regulation 12(4)(a) applies.

*10. UK Power Networks and distribution interface.*

NGET is not at detailed-development stage and no coordinated 132 kV substation, supergrid-transformer or Grid Supply Point design has been identified in the technical comments reviewed. No responsive correspondence, study or assessment answering points (a)–(d) has been identified as held. Regulation 12(4)(a) applies.

*11. Cumulative environmental assessment and coordination.*

NGET has not selected a site or developed a design and has not undertaken the project-specific cumulative assessment described in this section. The East Pye applicant's Environmental Statement and examination submissions are publicly available through the Planning Inspectorate and reflect the applicant's DCO scheme. No separate NGET assessment or record explaining the inclusion or exclusion of the named projects has been identified as held. Regulation 12(4)(a) applies.

*12. Records, searches and information held elsewhere.*

NGET has conducted searches of documents and has distinguished information it holds from contractual information administered by NESO and material published by the East Pye applicant and we have explained what documents are held in the sections above. NESO publishes the current TEC Register and administers connection contracts; the Planning Inspectorate publishes the East Pye DCO documents.

## Public interest in disclosure

In reaching this response, NGET has considered the public interest in placing the requested information in the public domain, taking account of the technical position described above. NGET currently has no preferred site for a new substation, is looking for alternative options so has not agreed the substation location or layout shown in the East Pye DCO and is not yet at detailed-development stage. The point of connection offered to East Pye was described as "Long Stratton 400 kV"; a typical 500 MW connection would require one customer bay, and any new NGET substation would normally be expected to use a double-circuit turn-in. However, no detailed turn-in design, site-specific layout, option appraisal, ultimate-development plan or wider strategic assessment has yet been completed.

Public-interest factors favouring publication

Publishing recorded information that is held would promote transparency and accountability in relation to potentially significant and permanent electricity infrastructure. It would help the East Pye examination, local communities and other interested parties understand the distinction between the applicant's proposed DCO layout and NGET's own position; whether the infrastructure is required solely for East Pye or may serve other customers or a wider network function; and the extent to which land, design, capacity and environmental assumptions remain provisional.

Disclosure could also support informed participation in the planning process, enable scrutiny of possible cumulative environmental effects, clarify the relationship between "Long Stratton 400 kV" and "North Anglia Connection Node A", and reduce the risk that preliminary assumptions are mistaken for settled NGET decisions. There is also a public interest in understanding how NGET seeks to avoid developing a site around a single customer in a way that could disadvantage future customers or consumers.

Public-interest factors against publication or favouring caution

Much of the requested detail is not currently held because no site has been selected and the project has not progressed to detailed design. Publishing speculative answers, creating new analysis or treating the East Pye applicant's assumptions as an agreed NGET design could mislead the public, prejudice an orderly siting and options process, and create false expectations about location, configuration, programme or future connection capacity. Premature publication of genuinely confidential customer information, including unsigned offers, negotiations, project-specific assumptions, costs, land strategies or technical solutions, could prejudice legitimate commercial interests, weaken negotiating positions or distort competition.

Publishing personal data could also cause unwarranted intrusion into individuals' privacy. These concerns do not justify blanket withholding: information should be considered item by item, and non-sensitive material should be disclosed through separation, redaction, anonymisation or aggregation where reasonably practicable.

Overall balance

NGET gives significant weight to the benefits of transparency, environmental scrutiny and informed participation. Accordingly, the response provides the technical information currently held and identifies relevant public sources. For the matters identified under Regulation 12(4)(a), however, information that was not held at the date of the request cannot be published, and the EIR does not require NGET to create a design, comparison, forecast or opinion.

On balance, the public interest favours maintaining that exception for information not held, while clearly explaining the present position and disclosing the information that does exist. If further responsive information is identified, any reliance on Regulation 12(5)(e) for commercial confidentiality will require evidence of a legally protected confidentiality and an adverse effect on a legitimate economic interest, followed by a case-specific public-interest test with the presumption in favour of disclosure. Personal data will be considered separately under Regulation 13. This approach provides the greatest practicable transparency without placing speculative, commercially harmful or unlawfully disclosed information in the public domain.

**Next Steps**

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please write to us within 40 working days, using the email address and reference number noted at the top of this letter and set out the reasons why you believe we have not answered your questions. The Information Commission website also provides guidance on the internal review process: what to do if you are dissatisfied with the response.

If you are still dissatisfied after our internal review, you can complain to the Information Commission. You should make complaints to the Information Commission within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foiandeircomplaints. Alternatively, they can be contacted at: Information Commission' Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL.

Thank you for your interest in the work of National Grid Electricity Transmission plc.

Yours sincerely

The EIR Team, National Grid Electricity Transmission Plc

**Appendix 1 – Information Request**

**Draft EIR request to NGET – 18 August 2026**

**Subject: Environmental Information Regulations 2004 request – proposed Long Stratton/Great Moulton 400 kV substation, North Anglia Connection Node A and related connections**

**Date: 18 August 2026**

Dear National Grid Electricity Transmission,

**Environmental Information Regulations 2004 request**

I request environmental information under the Environmental Information Regulations 2004 (EIR) concerning the proposed Long Stratton 400 kV National Grid substation south of Great Moulton, South Norfolk; the connection-site designations 'North Anglia Connection Node A' and 'Long Stratton 400kV'; and the relationship of those assets to East Pye Solar and other electricity projects.

The proposed substation forms part of the East Pye Solar DCO application EN0110014. The submitted Grid Connection Statement identifies National Grid Electricity Transmission plc (NGET) as the body expected to undertake the detailed design and construction of, and subsequently own and operate, the new National Grid substation and the works connecting it to the existing Norwich Main–Bramford 400 kV overhead line. That permanent NGET infrastructure is distinct from East Pye Solar Limited's project substations, battery energy storage system and cabling.

The East Pye documents describe a National Grid compound of up to approximately six hectares, potentially including a double-busbar arrangement and a turn-in of one or both existing 400 kV circuits. They also indicate that the National Grid substation would remain part of the transmission system after the generating and storage development is decommissioned. The published NESO connection registers use the designations 'North Anglia Connection Node A 400kV', 'North Anglia Connection Node A 132kV Substation' and 'Long Stratton 400kV' for a number of projects. I do not assume that those designations are interchangeable; a principal purpose of this request is to establish their identity and physical and electrical relationship from information held by NGET.

This request is for recorded information held by NGET as at 18 August 2026, including information held on NGET's behalf by its employees, project teams, consultants, contractors or agents. It includes final, draft and superseded records where they evidence the evolution of the location, purpose, design or intended use of the proposed infrastructure. I am not asking NGET to create new analysis, give a planning opinion or speculate where no recorded information is held.

**1. Identity, purpose and specification of the proposed substation**

Please provide reports, technical notes, engineering assessments, option papers, internal recommendations, decision records, drawings, meeting records and correspondence which identify:

a. the purpose or purposes for which the Long Stratton/Great Moulton substation has been specified;

b. the elements required solely for East Pye Solar's proposed connection of up to 500 MW export and 500 MW import;

c. any elements intended to provide a wider transmission-network, resilience, operational, maintenance, future-development or multi-user function;

d. whether NGET has specified or required a double-busbar arrangement and the recorded reasons for doing so;

e. whether NGET has specified or required a turn-in of both circuits of the Norwich Main–Bramford 400 kV line, and the technical, operational, resilience, maintenance or future-network reasons recorded for that requirement; and

f. any difference between the minimum connection required for East Pye and the maximum or preferred NGET configuration now being safeguarded or assessed.

**2. Connection and location alternatives**

Please provide recorded information concerning alternatives considered for connecting East Pye and/or establishing a connection node in this part of South Norfolk, including:

a. a single-circuit turn-in, tee connection, smaller switching station, single busbar or other reduced configuration;

b. alternative footprints, layouts, orientations or locations for the proposed substation;

c. air-insulated and gas-insulated switchgear options;

d. connection at Norwich Main, Yaxley, Bramford or another existing or proposed transmission substation;

e. a connection route or network solution not dependent on a new 400 kV substation at Great Moulton; and

f. the technical feasibility or network desirability of more than one new 400 kV connection node between Norwich Main and Yaxley, including any assessment of whether North Anglia Connection Node A and Long Stratton/Great Moulton could or should exist as separate assets.

For each option for which information is held, please provide the recorded reasons for retention, preference or rejection, including technical, cost, programme, land, environmental, operational and resilience considerations.

**3. Physical and electrical capability, expandability and safeguarded provision**

Please provide recorded information identifying:

a. the number and type of connection bays proposed initially, and the number required solely for East Pye;

b. the maximum number of bays, circuits or customer connections that the proposed layout and site could accommodate, with or without later extension;

c. spare or extendable busbar positions, bays, cable-entry positions, transformer positions, control facilities, access, drainage, landscaping, undeveloped land or other provision for subsequent connections;

d. the anticipated electrical capability after East Pye is connected, distinguishing physical equipment capability, contracted capacity and capacity that may become available only following reinforcement;

e. whether generation, BESS, demand, distribution or transmission connections could be accommodated without material enlargement of the proposed compound;

f. any provision for a 132 kV substation, supergrid transformers, Grid Supply Point or transmission-to-distribution interface; and

g. any maximum-development, ultimate-layout or phased-layout drawings or schedules prepared for the site.

I recognise that spare physical capability is not the same as immediately available connection capacity. The request seeks records which allow those concepts to be distinguished.

**4. North Anglia Connection Node A and Long Stratton designations**

Please provide recorded information which establishes:

a. whether ‘North Anglia Connection Node A 400kV’ is the same proposed asset as, forms part of, or depends upon the Long Stratton/Great Moulton 400 kV substation described in the East Pye DCO;

b. whether ‘Long Stratton 400kV’ refers to that same asset or to a different existing or proposed asset;

c. the proposed approximate location of each different asset, if the designations are not synonymous;

d. the location and relationship of ‘North Anglia Connection Node A 132kV Substation’ to the proposed 400 kV infrastructure;

e. when NGET first adopted, received or became aware of each designation and any recorded explanation for changes in naming;

f. whether Node A is regarded as a single-customer connection point, multi-user node, collector point, transmission switching node, Grid Supply Point or combination of functions; and

g. whether the 400 kV and 132 kV elements are being planned or safeguarded as a coordinated complex sharing land, access, busbars, transformers, cable corridors, environmental mitigation or expansion provision.

If these designations are unrelated to the proposed Great Moulton asset, please state that clearly and provide any information held identifying the alternative asset and its approximate location.

**5. Other projects and connection interests**

Please provide recorded information showing whether NGET has considered any contracted, proposed or reasonably anticipated connection other than East Pye when locating, designing, specifying, safeguarding land for, programming or assessing the proposed Long Stratton/Great Moulton substation or Node A infrastructure.

Without asserting that every entry represents a geographically defined project near Great Moulton, the projects of particular interest are:

1. East Pye Solar – combined solar generation and BESS;

2. Field Long Stratton – standalone BESS promoted by Field Energy;

3. Tasway Energy Park – solar generation and BESS promoted by Aukera Energy;

4. RPC/Elmya Carnation or Gissing – proposed solar generation and BESS in the Gissing area;

5. Noventum Long Stratton – solar-led connection project;

6. Enso or ‘Long Stratton 400’ – technology mix and project location to be clarified insofar as held;

7. GF Norwich BESS;

8. Swainsthorpe – technology mix and project location to be clarified insofar as held;

9. Intwood Farm BESS;

10. Wacton Road Farm – including whether this is the consented Wacton/Forncett BESS or a separate project;

11. Wymondham Road Farm; and

12. Old Stoke Road BESS.

For each listed project, and any other project which NGET has considered in connection with these assets, please provide information held on:

a. the customer/project name used in NGET records, promoter, technology and contracted or proposed import/export capacity;

b. the nature and date of any enquiry, application, modification, offer, accepted offer, feasibility discussion or other expression of interest involving NGET;

c. the connection site and voltage identified in NGET records;

d. the project's current connection status, including whether active, contracted, Gate 1, Gate 2, under assessment, deferred, paused, terminated, withdrawn, superseded or otherwise not progressing;

e. whether the project has supplied a geographically specific project site, Original Red Line Boundary or equivalent boundary, and the approximate location or parish of that site;

f. whether accepted Gate 2 land-rights evidence relates to the generation/storage site, cable route, connection corridor, substation land or a combination of those land interests;

g. any indicative cable route, connection corridor or point of connection held by NGET;

h. whether bays, busbar positions, transformer capability, cable-entry positions, land or other physical provision have been identified, allocated, reserved, safeguarded or assumed;

i. whether the project influenced the proposed substation's size, configuration, busbar arrangement, number of bays, land requirement, access, phasing or expansion capability;

j. whether its connection assumes or depends upon construction of the proposed Great Moulton 400 kV substation, and whether another connection solution is recorded if that substation is not built;

k. whether it could connect if East Pye were not consented or did not proceed; and

l. whether it relies upon land, rights, compulsory-acquisition powers or works proposed to be authorised or secured through the East Pye DCO.

Please also provide any record showing the total number and aggregate capacity of connections NGET currently understands could use these assets, distinguishing so far as held between contracted/Gate 2 projects, Gate 1 projects, other interests and projects no longer progressing. I am not asking NGET merely to reproduce a NESO register, but for NGET's own recorded information about the physical works and connection arrangements for which it is or may be responsible.

**6. Project locations, land information and confidentiality**

For projects whose public register entry does not reveal a precise development location, please provide the least geographically aggregated location information NGET holds which can be disclosed without revealing genuinely confidential detail. This may include parish, approximate coordinate, search area, distance or direction from the proposed connection point, redacted boundary plan, or confirmation that no geographically defined site has been supplied to NGET.

Where a site boundary, route or land-rights record is held but NGET considers the full document excepted, please consider partial disclosure by redacting landowner names, commercial terms and other protected information while retaining the project location, boundary geometry, general status and environmental context. If even approximate location is withheld, please identify the EIR exception relied upon and explain the public-interest balance.

**7. East Pye DCO land, powers, agreements and delivery dependency**

Please provide recorded information identifying:

a. the land and rights within the East Pye Order limits which NGET requires for the permanent substation, overhead-line works, access, construction, drainage, landscaping, cables and future operation;

b. whether those land interests or powers are sufficient for NGET's current preferred and ultimate layouts, including any multi-user or 132 kV provision;

c. any agreement, heads of terms, interface arrangement, technical approval, design acceptance or other commitment between NGET and East Pye Solar Limited relevant to delivery of the NGET works;

d. which aspects of location, layout, access, turn-in arrangement, equipment, programme, ownership, funding and delivery remain unagreed or conditional;

e. whether NGET could deliver the proposed substation without East Pye obtaining the DCO and its associated land or powers;

f. whether NGET would retain or exercise any land or rights secured through the DCO if East Pye did not proceed; and

g. any recorded contingency or alternative for East Pye and for other connection customers if the Great Moulton substation is delayed, reduced, relocated or not constructed.

**8. Present design, programme and decision status**

Please provide records showing the status as at 18 August 2026 of NGET's consideration, specification or approval of the substation's location, footprint, orientation, access, construction compound, single- or double-circuit turn-in, busbar configuration, bays, permanent and temporary pylons, equipment heights, landscaping, drainage and indicative East Pye DCO layout.

Please distinguish matters that are required, agreed, preferred, provisional, illustrative or subject to detailed design, and provide the latest programme or milestone record for design, land acquisition, technical sanction, funding, consents, procurement, construction, energisation and connection. Please also provide any recorded assessment of the consequences for East Pye or other customers if those milestones are not achieved.

**9. Permanent and strategic network role**

Please provide recorded information explaining:

a. the anticipated network function of the substation after East Pye is decommissioned or if East Pye does not proceed;

b. whether permanent retention assumes, anticipates or facilitates other connections or network functions;

c. whether any mechanism exists for removal if there is no continuing network requirement;

d. when the Long Stratton/Great Moulton location was first identified as a possible 400 kV node and whether that occurred solely in response to East Pye;

e. whether and when its role evolved from an East-Pye-specific connection solution to a potential multi-user or strategic node;

f. any strategic assessment of its relationship with Norwich Main, Yaxley, Bramford, Norwich–Tilbury or other planned East Anglia transmission works; and

g. any recorded assessment of whether a suitably configured Long Stratton/Great Moulton substation could act as the single new 400 kV connection node for the relevant projects between Norwich Main and Yaxley.

**10. UK Power Networks and distribution interface**

Please provide correspondence, meeting records, studies or assessments between NGET and UK Power Networks concerning:

a. a future transmission-to-distribution connection or Grid Supply Point;

b. distribution reinforcement in South Norfolk;

c. a 132 kV substation or supergrid transformer provision associated with Node A; and

d. the potential for the NGET substation to facilitate further generation, storage or demand connections to the distribution network.

If no such information is held, please confirm that position.

nationalgrid

**11. Cumulative environmental assessment and coordination**

Please provide recorded information showing whether NGET has undertaken, commissioned, reviewed or contributed to any assessment of the cumulative environmental effects of:

a. the permanent NGET substation, overhead-line modifications, access and associated works together with East Pye's substations, BESS, cabling and solar development;

b. the NGET infrastructure together with Field Long Stratton, Tasway, the Wacton/Forncett BESS, the Gissing proposal and/or any other known connection project;

c. the progressive concentration of transmission, distribution, generation, storage and cable infrastructure around Great Moulton, Wacton and Long Stratton; and

d. the landscape and visual, land-use, traffic, noise, drainage, ecological, heritage, agricultural and community effects of the maximum reasonably foreseeable build-out associated with the proposed node.

Please include any correspondence or meeting record with East Pye Solar Limited, NESO, UKPN, the Planning Inspectorate, South Norfolk Council, Norfolk County Council or another project promoter about the cumulative assessment, the list of projects to be assessed, the division of assessment responsibility, or the risk that related infrastructure is assessed through separate consent processes without an assessment of the combined outcome.

Please also provide any record explaining why a known project was included in or excluded from the cumulative-effects assessment supporting the East Pye DCO, where NGET was consulted or supplied information relevant to that decision.

**12. Records, searches and information held elsewhere**

The record types sought include reports, drawings, option and design studies, connection and modification studies, technical specifications, sanction papers, risk registers, programmes, meeting minutes, presentations, correspondence and material exchanges with NESO, East Pye Solar Limited, other customers, consultants and public bodies. Relevant search terms are likely to include 'Long Stratton', 'Great Moulton', 'North Anglia Connection Node A', 'Node A', 'East Pye', the project names in section 5, and corresponding customer or connection-agreement references.

Where information within scope is held principally by NESO or another public authority, please apply Regulation 10: either transfer the relevant part of the request or identify the authority believed to hold it and provide its contact details. I would prefer to be consulted before any transfer involving disclosure of my personal contact details.

**Form of disclosure and handling of exceptions**

I prefer electronic disclosure. Where information is contained in existing records, I seek copies of those records rather than a newly prepared narrative. Native or searchable formats are preferred for spreadsheets, drawings and schedules where reasonably practicable.

If NGET considers that any information engages an EIR exception, please identify the information withheld, specify the precise exception, explain any required public-interest test, and disclose the remainder by separation, redaction, anonymisation or aggregation. Please distinguish information not held from information held but withheld. Where the existence of a specifically named customer or project is itself said to be protected, please address whether confirmation of broad technology, capacity, status, connection location and approximate geography can nevertheless be given.

If any part is considered too general or manifestly unreasonable by reason of burden, please provide advice and assistance under Regulation 9 and invite refinement rather than refusing the request as a whole. Please identify the record systems, date ranges or question groups which create the burden and indicate what narrower formulation would allow disclosure.

**Priority and staged response**

To facilitate a proportionate search, my priorities are:

Priority 1: sections 4 and 5 – the identity of Node A/Long Stratton, the projects expected to use it, their approximate locations and their dependency upon the Great Moulton substation;

Priority 2: sections 1, 3, 7 and 8 – the purpose, capacity, design, land/powers, agreement status and delivery programme of the NGET works; and

Priority 3: sections 2, 6 and 9–12 – alternatives, land/location detail, strategic role, distribution interface, cumulative assessment and supporting records.

If the full request cannot be answered within the normal period, I invite NGET to disclose Priority 1 first, followed by the remaining information on a staged basis. This prioritisation does not withdraw the other parts of the request.

**Timing of response**

Regulation 5(2) requires environmental information to be made available as soon as possible and no later than 20 working days after receipt. If received on 18 August 2026, I calculate the normal response date as 16 September 2026, allowing for the summer bank holiday on 31 August.

If NGET considers the complexity and volume make it impracticable to comply within 20 working days and proposes to rely on Regulation 7, please notify me within the initial period, explain the reasons and confirm the revised deadline. A full 40-working-day period from receipt on 18 August 2026 would end on 14 October 2026.

**Purpose and public interest**

I am a local householder and an Interested Party in the East Pye Solar DCO examination. I intend to place the substance of this request and relevant information from NGET's response before the Examining Authority. The request is intended to establish, from contemporaneous records, the purpose, scale, configuration, deliverability, residual capability and wider environmental and network role of permanent infrastructure proposed in the countryside south of Great Moulton.

There is a significant public interest in enabling the Examination to distinguish infrastructure required solely for East Pye from infrastructure which provides or safeguards a wider multi-user function; to understand whether additional projects have geographically defined sites and depend upon the same node; and to assess the reasonably foreseeable cumulative environmental implications before permanent land and powers are authorised. Disclosure, with proportionate redaction where necessary, would reduce uncertainty and assist informed public participation and decision-making.

Yours faithfully,

Rob Shipway
[redacted]

## Appendix 2 – NESO EIR Response 19.10.26

**Public**
Ref: FOI/26/225

National Energy System Operator
Faraday House
Gallows Hill
Warwick
CV34 6DA

InformationRights@neso.energy
www.neso.energy

19 October 2026

Dear requester

**Request for Information**

Thank you for your request for information which was received by NESO on 21 September 2026. Your request has been considered under the Environmental Information Regulations 2004 (EIR) as (the requested information falls within the definition of environmental information at Regulation 2(1) of the EIR.

**Request**
You asked us:

*Please provide any recorded information that NESO holds and can disclose about the actual or indicative physical location of the following projects:*

1. *Wacton Road Farm, understood to be the Wacton Hall Farm BESS – PRO-004440.*
2. *Norwich Main BESS, promoted by Tasway Energy Park Limited – PRO-003894 (stages PRO-003894-1 and PRO-003894-2).*
3. *RPC Elmya Gissing – please identify the relevant current or former TEC Project Number.*
4. *Noventum – Long Stratton – PRO-004405.*
5. *Long Stratton 400, promoted by Enso Green Holdings X Limited – PRO-004868.*

*This should include any coordinates, plans, maps, parish or locality information, indicative search areas, or other information indicating where each project is or is expected to be situated.*

National Energy System Operator Limited
Company Number 11014226
Registered office address St Catherine's Lodge, Bearwood Road,
Sindlesham, Nr Wokingham, Berkshire, RG41 5BN

*If NESO cannot disclose an exact location, please provide the most detailed approximate location that can be disclosed.*

**Our response**

We can confirm that NESO holds information in scope of your request.

Recorded information held by NESO on the connection site for the projects listed in your request is publicly available via the TEC Register: Transmission Entry Capacity (TEC) register | National Energy System Operator

The TEC Register is a publicly available list of projects that hold contracts for Transmission Entry Capacity (TEC) with NESO. These include existing and future connection projects and projects that can be directly connected to, or make use of, the National Electricity Transmission System (NETS). The register is published twice weekly and is updated when contracts are signed or terminated, and when contractual milestones are met. The Connection Site is provided by the relevant Transmission Owner and included within the connection offer issued to the customer/developer. As a result, the Connection Site recorded on the TEC Register may be subject to change if the contractual position changes.

The publicly available information contained within the TEC Register, including the Connection Site, falls within the scope of your request and provides an indication of the location of the projects identified.

For context, the projects referenced in your request that currently appear on the TEC Register hold Gate 1 agreements.

In respect of RPC Elmya Gissing, NESO can confirm that the project has terminated. The relevant TEC Project Number was PRO-004657. The project was included on the TEC Register in error on 7 October 2026 and is scheduled to be removed shortly.

NESO will not disclose information about specific developers or their projects beyond what is publicly available. We are therefore refusing your request for further information relating to the actual or indicative physical location of the projects referenced in your request.

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Regulation 12(5)(e) - Commercial Confidentiality

The withheld information is exempt from disclosure under Regulation 12(5)(e) of the Environmental Information Regulations 2004.

Regulation 12(5)(e) provides that a public authority may refuse to disclose information where disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

This exception applies where:

- the information is commercial or industrial in nature;
- confidentiality is provided by law;
- that confidentiality protects a legitimate economic interest; and
- that confidentiality would be adversely affected by disclosure.

The information requested relates to specific developers and their projects. Disclosure of site-specific locational information, including indicative locations, could adversely affect the legitimate commercial interests of those developers by revealing commercially sensitive project information that is not otherwise publicly available.

In our opinion, the redacted information is confidential in law. NESO falls within the scope of the Utilities Act 2000 and Section 105 of that Act makes it a criminal offence to disclose information: a) obtained under the Utilities Act 2000 and any other key energy legislation such as the Gas Act 1986 and the Electricity Act 1989, subject to specific exceptions; and b) where the information relates to the affairs of any individual or any particular business during the lifetime of the individual or so long as the business continues to be carried on. There is also a common law duty of confidence with respect to the project and company specific information.

Our use of the exception at Section 12(5)(e) of the EIR is primarily in respect of the potential consequence to the developers' commercial interests which are covered by confidentiality obligations in the CUSC and under Section 105 of the Utilities Act. NESO has no specific consent from any of the developers referred to in the disclosed items to make public their commercial information.

All exceptions in the EIR are subject to a public interest test.

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NESO is mindful that the EIR requires us to apply a presumption in favour of disclosure when considering the public interest test. There is a public interest in the accountability of NESO as a public corporation and in our transparency regarding our activities, including the connections process. We understand that local communities close to where projects are being considered or developed have a clear interest in understanding more about specific projects and the decision-making process and that there is a wider public interest in understanding how projects are developed and approved and how renewable energy infrastructure is used and sited.

There is a public interest in ensuring that developers are not unfairly disadvantaged. Disclosure is likely to harm the relationship between NESO and connections customers and would reduce trust in NESO more widely in the energy sector. If suppliers of information are concerned about the disclosure of confidential information, such that they are unwilling to provide information in the future, this would have a detrimental effect on NESO's ability to carry out our role in delivering our licensed activities.

As the designated independent system operator and planner under the Energy Act 2023 NESO must remain independent, fair, and consumer focused. Disclosure could erode trust within the sector, hampering NESO's role and our ability to drive forward reforms and initiatives that would bring benefits to consumers and to the environment.

The confidentiality obligations in Section 105 of the Utilities Act make it an offence for us to disclose information provided to us by a developer and it is not in the public interest for public corporations to breach statutory confidentiality obligations. On the basis of this strong statutory obligation and the public interest arguments set out above, we believe that the balance of the public interest supports the use of the exception.

This concludes our response to your request.

**Advice and Assistance**

NESO does not own or operate the electricity network infrastructure. The companies that own the infrastructure and assets that make up Great Britain's transmission system are called Transmission Owners (TOs). These companies propose, build and maintain the network infrastructure. It is the TO that advises the proposed Connection Site for a project and this will be reflected in the Connection Offer NESO makes to the Customer and thereby the Connection Site recorded on a project's entry on the TEC Register.

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Registered office address St Catherine's Lodge, Bearwood Road,
Sindlesham, Nr Wokingham, Berkshire, RG41 5BN

NESO has recently published an explainer on Great Britain's Electricity Transmission Network which is intended to provide the public with information on how the electricity transmission system is planned, operated and expanded, including an explanation of the roles different organisations play within the energy system: Electricity Transmission Network Explainer | National Energy System Operator.

Further information on Connection Sites is also available through Connections 360: https://www.neso.energy/industry-information/connections/connections-360

Connections 360 has been developed to provide data transparency. A NESO account is required to use Connections 360. If you are an existing Connections Portal user, you can log in with your account details. Otherwise, you can create an account via the webpage.

If you require further information regarding the location of a project, you may wish to contact the relevant developer directly. You may also wish to direct requests relating to transmission network infrastructure to National Grid Electricity Transmission (NGET), which is also subject to the Environmental Information Regulations. Further information is available here: Environmental Information Regulations ("EIR") 2004 | National Grid. NGET can also be contacted by email box.EIRrequests@nationalgrid.com

Our disclosure log includes responses we have made to requests under the Freedom of Information (FOI) Act 2000 and the Environmental Information Regulations (EIR) 2004 since 1 October 2004. Here you will also find other responses about connections projects: https://www.neso.energy/corporate-information/freedom-information-and-environmental-information-regulations/disclosure-log#sortCriteria=date%20descending

**Next steps**

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: Freedom of Information and Environmental Information Regulations | National Energy System Operator. The ICO's website also provides guidance on the internal review process: What to do if you are dissatisfied with the response | ICO.

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website:

National Energy System Operator Limited
Company Number 11014226
Registered office address St Catherine's Lodge, Bearwood Road,
Sindlesham, Nr Wokingham, Berkshire, RG41 5BN

www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,
The Information Rights Team, National Energy System Operator (NESO)

National Energy System Operator Limited
Company Number 11014226
Registered office address St Catherine's Lodge, Bearwood Road,
Sindlesham, Nr Wokingham, Berkshire, RG41 5BN

## Appendix 3 – My Request for Internal Review NGET 27.10.26

**REQUEST FOR INTERNAL REVIEW**

NGET reference: EIR 234 | Response dated 20 October 2026

To: National Grid Electricity Transmission plc – EIR / Information Requests Team

Subject: EIR 234 – Request for internal review and supplementary clarification

Dear Information Requests Team,

Thank you for your response of 20 October 2026 to my Environmental Information Regulations request of 18 August 2026. I appreciate the care taken to explain NGET's present position on the proposed Long Stratton 400 kV connection, including the distinction between the contractual connection offer and the detailed design of transmission infrastructure. I also recognise that essential engineering decisions may properly remain under consideration, and that NGET is not required under the Regulations to create studies or drawings which do not exist.

I would nevertheless be grateful if NGET could undertake an internal review of its response, principally where Regulation 12(4)(a) (information not held) has been relied upon, and provide the focused clarifications below. My purpose is to understand the nature and extent of existing recorded information, not to ask NGET to produce a new engineering solution or to prejudge the merits of its eventual design.

**1. Existing records distinguished from completed studies**

Your response indicates that a number of detailed studies, options appraisals and design decisions have not yet been completed. I accept that this may be so. Could the review nevertheless reconsider whether NGET holds recorded preliminary information relevant to the questions in my original request, including correspondence with the applicant, meeting notes, indicative layouts, preliminary network diagrams, technical assumptions, feasibility material or records explaining why particular arrangements remain unsettled?

Where information is not held, I would welcome confirmation of the scope of the searches undertaken and, so far as reasonably practicable, a distinction between (a) no relevant recorded information, (b) information held in provisional form but not as a completed study and (c) information held by another body. I do not suggest that NGET should compile a new assessment to respond to the request.

**2. The identity and geographical position of the connection node**

Answer 4 identifies the offered connection as "Long Stratton 400 kV", but does not confirm whether that designation, "North Anglia Connection Node A" and the proposed Great Moulton substation shown in the East Pye DCO refer to the same physical asset. This uncertainty has particular significance when considering the geographical implications of network development between Norwich Main and Yaxley.

Could the review establish whether any existing records, including correspondence or diagrams, explain the identity of these designations, their voltage levels, whether they denote distinct or provisional nodes, and their relationship to the proposed DCO substation? An existing schematic or appropriately redacted extract would be valuable; a short explanation of what is and is not presently established would also help.

**3. The proposed DCO site, Work No. 4A and alternatives**

I was particularly struck by the indication that the substation location and design depicted in the DCO are not agreed by NGET and that NGET would not construct at the location shown. I recognise that an applicant's illustrative layout need not constitute NGET's final engineering design. Nevertheless, there is a material distinction between flexibility within an environmentally assessed development envelope and the possibility that essential works might require a materially different site or consenting route.

Please could the review reconsider whether NGET holds existing correspondence, drawings or other records explaining the extent of the disagreement or uncertainty, what "location shown" refers to, any alternative sites or configurations already discussed, and whether the current alternatives are understood to fall within Work No. 4A and the DCO Order limits? I appreciate that final answers may not yet exist.

**4. Overhead-line turn-in and the network configuration**

The response indicates that a double-circuit turn-in is NGET's normal preference, but that the detailed arrangement remains unsettled. Could the review consider whether any existing records identify preliminary options for circuits, towers, diversions, land requirements or the connections to Norwich Main and Yaxley, including information already provided to or received from the applicant? Such information could assist understanding of the reasonable worst-case environmental effects without requiring a completed engineering design.

**5. Provision for future customers and the East Pye-only comparison**

I acknowledge NGET's explanation that its design would not necessarily be confined to East Pye's immediate requirements in a way that prejudices future customers. That is not, of itself, evidence of excessive provision or of committed future projects. My concern is whether existing records distinguish infrastructure required for East Pye's 500 MW connection from requirements associated with operational resilience, ordinary future-proofing, wider system plans or identifiable additional connection prospects.

Could the review clarify whether NGET holds any recorded assessment, assumption, bay-allocation material, correspondence or preliminary comparison relevant to that distinction, even if no final customer allocation or multi-user design has been completed? I am not seeking the disclosure of individual customers' confidential commercial arrangements where such disclosure would be unlawful.

**6. Connection history and environmental assessment**

The East Pye applicant's Grid Connection Statement refers to the 2022 application and offer and the July 2023 bilateral connection agreement. In view of NGET's current reservations about the location and layout, I would welcome a reconsideration of whether existing records document NGET's position at those stages, any subsequent changes, and information shared with the applicant about the scope of the infrastructure to be assessed. Similarly, where no separate NGET cumulative assessment has been prepared, could the review distinguish that fact from any environmental or network development material already held and relevant to the original request?

**7. The public interest and proportionate disclosure**

My request was prompted by the East Pye Solar DCO Examination and concerns about whether a new 400 kV transmission node could facilitate further generation and storage developments, with cumulative implications for the countryside and nearby communities. This is a hypothesis to be tested, rather than a conclusion I invite NGET to accept. I fully recognise that legitimate confidentiality, safety and security concerns may limit what can be made public.

To the extent that recorded information is held but considered sensitive, I would welcome consideration of whether non-confidential extracts, redacted diagrams, aggregated descriptions or a limited explanation could be disclosed. If any exception is relied upon, please identify it and explain the corresponding public-interest assessment as appropriate. I recognise the presumption in favour of disclosure under Regulation 12(2) and the approach to separable information under Regulation 12(11).

For completeness, I am sharing NGET's response, alongside NESO's response and my interpretation of their significance, with the East Pye Examining Authority as proposed supplementary evidence, subject to its procedures for accepting late material. If the review produces further clarification within the Examination timetable, I would similarly hope to make its outcome available. I mention this solely to explain the context and to assist the Examination in working from the fullest and most accurate evidence; it is not intended to influence or place pressure on NGET's review decision. I am not asking the Examining Authority to determine my EIR complaint.

**8. Scope, procedure and the Information Commissioner**

Please treat the points above as grounds for an internal review insofar as they concern information within the scope of my original EIR request, including the adequacy of searches and the application of Regulation 12(4)(a). Where any of my requests for further explanation or a document category go beyond that original scope, I would be grateful if you would

identify those elements and, where appropriate, treat them separately as a supplementary EIR request without delaying the internal review.

If the original response is upheld in whole or part, a concise explanation of the principal reasons and the searches undertaken would be most helpful. I would also appreciate confirmation of NGET's internal review procedure and anticipated response arrangements, together with the relevant contact details and procedure for referring any remaining concerns to the Information Commissioner's Office following the review. I understand that Regulation 11 provides for a review outcome within 40 working days.

Thank you again for considering these matters. I hope that a proportionate review can help distinguish matters on which recorded information exists from those which genuinely await future design work, without compromising legitimate commercial or operational interests.

Yours faithfully,

Rob Shipway

*Reference material: NGET EIR 234 response of 20 October 2026; East Pye Solar DCO EN0110014, Grid Connection Statement APP/7.12; Supplementary Submission to the Examining Authority dated 27 October 2026; Environmental Information Regulations 2004, Regulations 11, 12 and 14.*

## Appendix 4 – My Request for Internal Review NESO

**REQUEST FOR INTERNAL REVIEW**

*NESO reference FOI/26/225 Response dated 19 October 2026*

To: NESO Information Rights Team (InformationRights@neso.energy)

**Subject: FOI/26/225 – Request for internal review and supplementary clarification**

Dear Information Rights Team,

Thank you very much for your considered response of 19 October 2026 to my request of 21 September 2026. I appreciate NESO's explanation of the TEC Register, its confirmation concerning the current Gate 1 entries and its clarification that RPC Elmya Gissing (PRO-004657) has terminated. I also recognise the importance of protecting developers' genuinely confidential commercial information and your responsibilities in that regard.

I would nevertheless be grateful if NESO could undertake an internal review of the decision to withhold further geographical information under Regulation 12(5)(e) of the Environmental Information Regulations 2004. I hope the following focused points will assist that review. They are not intended to dispute the need for appropriate commercial safeguards.

**1. The nature of the information requested**

My principal concern is to explore whether broad geographical information could be disclosed without exposing detailed land negotiations, site acquisition strategies or commercially sensitive design information. In particular, I would welcome reconsideration of approximate site locality, parish, electoral ward, broad search area or other recorded geographical descriptors for each project.

I appreciate that a small parish or an isolated area could occasionally identify a site almost as precisely as a plan. I am therefore not seeking any rigid disclosure rule, but the most informative level of detail that NESO considers lawful for each project.

**2. Prior public disclosure**

It appears that Tasway Energy Park has already been promoted publicly using indicative geographical plans. There are also public planning records concerning a proposed Wacton Road BESS, although I recognise that confirmation is needed that this is the same scheme as NESO project PRO-004440.

Could the review please consider, project by project, whether any location information requested is already substantially in the public domain, and whether that affects the confidentiality or public-interest assessment? I appreciate that NESO may hold other, more detailed information which remains sensitive.

**3. Developer views and consent**

Your response states that NESO has no specific consent from the developers to publish their commercial information. I understand this may be relevant background

but would be grateful for clarification as to whether the developers were consulted, whether any had expressed an objection, or whether NESO relied on previously expressed statements about their commercial concerns.

I understand that responsibility for applying Regulation 12(5)(e) and the public-interest test remains with NESO, rather than resting solely on developer consent. I would be grateful if the review could explain how NESO evaluated the anticipated commercial harm in the individual circumstances of the projects.

**4. The public-interest balance**

My request was made against the background of the ongoing East Pye Solar DCO Examination and the possible cumulative implications of future electricity projects for communities around Great Moulton. This is not a request for competitors' negotiating information: it is intended to assist understanding of the geographical distribution of potentially substantial developments and possible reliance on new 400 kV grid infrastructure.

Could the review reconsider whether the public interest in enabling informed environmental participation warrants disclosure of at least some less specific recorded geographical information, even if more detailed information is protected? I note the presumption in favour of disclosure in Regulation 12(2) and the duty, where practicable, to disclose separable information under Regulation 12(11).

For completeness, I should mention that I am providing NESO's response to the East Pye Solar Examining Authority as proposed late evidence, to clarify and update the position as it stood when I made my original Examination submission. Subject to the Examining Authority's procedures for accepting further material and the extent to which further evidence within the Examination's intended timetable, I would also intend to share the outcome of this review. I mention this simply so that NESO is aware of the context and so that the Examination can be informed by the fullest and most accurate account available; it is not intended to place any particular expectation on the outcome of NESO's consideration.

**5. Project maturity and changing sensitivity**

I do not suggest that the entry into Gate 1 that you have confirmed for each of these projects automatically removes commercial confidentiality. However, I would be grateful if the review could consider whether sensitivity varies between projects, and over time, particularly where promoters have undertaken public consultation, submitted planning applications or published site information.

I would also welcome consideration of whether the termination of PRO-004657 changes the assessment of its historic location information, while recognising that some related commercial interests may survive termination.

**6. Clarification of information held**

Separately, and without asking NESO to disclose the contents of exempt records, I would welcome a project-by-project indication, so far as practicable, of whether it holds:

- (i) broad locality/parish/ward information;
- (ii) geospatial coordinates or site addresses;
- (iii) indicative sites, land parcels or boundary plans;
- (iv) solar or BESS layout plans;
- (v) cable routes, substations or connection corridors; and
- (vi) alternative sites or routes.

For each category, it would be helpful to distinguish information held but withheld, information not held, and information held by another organisation rather than by NESO or on its behalf. I recognise that the Regulations may not require production of a bespoke document schedule or creation of new geographical analysis; a concise table or narrative clarification would be entirely sufficient if available.

**7. The statutory confidentiality point**

I acknowledge the statutory and contractual confidentiality duties identified in your response, including section 105 of the Utilities Act 2000. I would appreciate clarification of how those duties were considered alongside Regulation 5(6) of the EIR, and the separate requirements of Regulation 12(5)(e) and its public-interest test.

My request does not suggest that such duties are unimportant, only that the proper balance may differ according to the precision of the information requested and whether equivalent facts have previously been made public.

**8. Scope and handling of this correspondence**

Please treat paragraphs 1–5 and 7 above as grounds for reviewing the refusal insofar as they concern the information encompassed by my original request. To the extent that paragraph 6, or the request for particular ward or parish descriptions, is considered by you to ask for new information outside that request, I would be grateful if it could be registered separately as a supplementary EIR request, without delaying the internal review of my original quest.

If NESO concludes that the decision should remain unchanged, an explanation identifying the principal project-specific considerations, without revealing protected details, would assist me in understanding the reasons. I would also appreciate confirmation of the available next steps for referral to the Information Commissioner.

Thank you again for considering these points. I recognise that the competing responsibilities involved requires a fine balance to be struck but hope that a proportionate approach can provide greater geographical transparency while continuing to protect legitimate commercial interests.

Yours faithfully,

Rob Shipway

Reference material for the review: ICO guidance, "Commercial or industrial information (regulation 12(5)(e))"; Environmental Information Regulations 2004, Regulations 5 and 12; NESO letter FOI/26/225 of 19 October 2026.