

Planning Act 2008:**Additional Written Representation of Alcemi Storage Developments 1 Limited (“Alcemi”)****Application by National Grid Electricity Transmission Limited (“NGET”) for an Order granting Development Consent (“DCO”) for the Norwich to Tilbury (“N2T”) Scheme**

Planning Inspectorate Reference: EN020027

Further to Alcemi’s relevant representation submitted on 27 November 2025 (a copy of which is appended), Alcemi wishes to make this additional written representation in relation to the application by NGET’s for a DCO for the N2T Scheme.

As set out in Alcemi’s relevant representation submitted on 27 November 2025, Alcemi is to be the Applicant for planning permission under the Town and Country Planning Act 1990 for a proposed Battery Energy Storage scheme (“Brunfort BESS”) which will sit directly to the south of the existing National Grid Bramford substation.

Alcemi currently hold an Option for Lease, dated 18 March 2025 with Thornbush Energy Limited, (“Alcemi Option”) over land around the existing National Grid Bramford substation for the delivery of the Brunfort BESS (“ Alcemi Option Land”).

Areas of the Alcemi Option Land also form part of the N2T Scheme.

It is noted that details of the Alcemi Option Land are not included in the Book of Reference.

Further Communications with Promoter

Since submission of Alcemi’s relevant representation, Alcemi have been following up with NGET’s N2T Project Team seeking to continue the collaboration and detailed discussions on the likely interfaces between the Brunfort BESS and the N2T Scheme.

However, collaboration and discussions have stalled since submission of the application for the DCO.

Alcemi are looking to ensure a mechanism for continued collaboration and detailed discussions is formalised with NGET to ensure that the Brunfort BESS and the N2T Scheme can both come forward successfully without unforeseen impacts arising.

Alcemi are disappointed that there has not been further progress or detailed dialogue on the Interface Position Statement and Draft Deed of Undertaking. Indeed, while there have been responses to emails from NGET in December, January and February, and the promise of a substantive response on both documents which currently sit with NGET, this has so far fallen short of the progress needed to approach an agreed solution.

For the Examining Authority’s information, the most recent version of the Interface Position Statement was issued to NGET on 30 May 2025, and a Draft Deed of Undertaking was issued to NGET on 6 June 2025.

Assurances are needed from NGET that the promised collaboration will now be prioritised to provide the certainty needed for the Brunfort BESS project. Alcemi wish to take forward the necessary discussions with NGET as a matter of urgency to allow an agreed and documented position to be reached, and a meeting has now been scheduled for 4 March 2026.

Alcemi Position on the Proposals for Compulsory Acquisition of Land and Rights impacting on the Alcemi Option

Without an agreed position being reached with NGET, the plots which would impact on the Alcemi Option, and therefore the Brunfort BESS, are:

Class 1 Compulsory Acquisition of Land (Brown):

20/218

Class 2 Compulsory Acquisition of Rights – Overhead Line (OHL) (Green):

20/231, 20/240, 20/254, 20/261, 20/262, 20/263, 20/264, 20/268, 21/94

Class 3 Compulsory Acquisition of Rights – Underground Cable (UGC) (Orange):

20/241, 20/251, 20/270

Class 4 Compulsory Acquisition of Rights – OHL / UGC (Grey):

20/269 (part only)

Class 5 Compulsory Acquisition of Rights – Access (Blue):

20/224, 20/248, 21/100

Class 6 Compulsory Acquisition of Rights – Drainage (Purple):

20/255, 20/271

Class 9 Temporary Use (Yellow):

20/219, 20/255, 20/238, 20/245, 20/265, 20/266

It should be noted that minor updates have been made to the above list to that provided in Alcemi's relevant representation.

In terms of the compulsory acquisition of land, Alcemi are still seeking to understand from NGET what the intention is for the permanent acquisition of plot 20/218 which overlaps with the Brunfort BESS redline area.

In terms of the compulsory acquisition of rights, Alcemi require confirmation that these rights, once exercised by NGET, will sit alongside existing rights in the land and will not sterilise those areas from future development. In particular, Alcemi are looking for assurances that the acquisition of the intended rights will not impede the exercise of the Alcemi Option, nor prevent the delivery of the Brunfort BESS. This is particularly important for rights in relation to OHL or UGC, where Alcemi intend to install infrastructure below or above NGET's infrastructure (e.g. plots 20/240 and 20/268, among others). As noted previously, details of the Alcemi Option Land are not included in the Book of Reference, and it is therefore understood that there is no intention to extinguish any of the rights which the Alcemi Option secures.

Godbold / Thornbush Energy Limited Position

As mentioned above, Alcemi currently hold an Option for Lease, dated 18 March 2025 with Thornbush Energy Limited, over land around the existing National Grid Bramford substation for the delivery of the Brunfort BESS. They are not involved in the separate representations being made on behalf of the Thornbush Energy Limited (and on behalf of the Godbold family for the wider landholdings around Bramford substation).

Alcemi's interests are separate from those of the owners, and are concerned with the ability to deliver the Brunfort BESS and the preservation of their Option, alongside seeking a voluntary agreement (via the Interface Position Statement and draft Deed of Undertaking) with NGET to ensure they retain all of the rights required for the Brunfort BESS and the ability to collaborate on their respective proposals.

Alcemi Position on wider Proposals for Compulsory Acquisition of Land and Rights

Separate to the Alcemi Option Land (all plots on Land Plan Sheet 20), Alcemi are noted in the Book of Reference as category 2 and 3 persons for the following plots – B21/1, B-21/7, B-21/25, B-21/31, B-21/47, B-21/58 (all plots on Land Plan Sheet 21).

Whilst B21/1 is marked as 'Class 9 Temporary Use' (Yellow), the remaining plots are within the Bullen Lane access road and all marked as 'Class 1 Compulsory Acquisition of Land'. All of these plots are shown as owned by R Jackson (East Anglia) Limited and covered by Unilateral Notice to take a lease as contained in an Option Agreement to Alcemi dated 28 March 2024. These plots are all noted as easements / other private rights proposed to be extinguished, suspended or interfered with.

Alcemi are looking to NGET to provide detail on how their own rights of access along this road will be preserved and to cover this in the proposed Deed of Undertaking.

Conclusion

Until agreement has been reached with NGET on all matters to its satisfaction, including – for the Alcemi Option Land – reaching an agreed position on the Interface Position Statement and entering into a suitable Deed of Undertaking, Alcemi must object to the making of the DCO.

Alcemi reserves the right to be heard at an appropriate hearing to explain in detail the impacts of the scheme on the Brunfort BESS, and also reserves the right to supplement these representations depending on their engagement with NGET as the Examination process progresses.

Addleshaw Goddard LLP / Submitted via PINS Portal 26.02.26

**Section 56 Planning Act 2008:
Relevant Representation of Alcemi Storage Developments 1 Limited (“Alcemi”)**

**Application by National Grid Electricity Transmission Limited (“NGET”) for an Order granting
Development Consent for the Norwich to Tilbury (“N2T”) Scheme**

Planning Inspectorate Reference: EN020027

Alcemi is to be the Applicant for planning permission under the Town and Country Planning Act 1990 for a proposed Battery Energy Storage scheme (“Brunfort BESS”) which will sit directly to the south of the existing National Grid Bramford substation. Since late 2023, Alcemi and the NGET N2T Project Team have been working together to identify likely interfaces between the projects, and set out an agreed position for these interfaces, as well as a mechanism to ensure ongoing collaboration for resolution of any potential issues associated with these interfaces.

Alcemi currently hold an Option for Lease over land around the existing National Grid Bramford substation for the delivery of the Brunfort BESS (“the Alcemi Option land”). Areas of the Alcemi Option land also form part of the N2T scheme. For these areas, whilst the relevant Landowner is set out in the Book of Reference as Olive Ann Godbold, we note that transfers have taken place since the compilation of the Book of Reference meaning that the Landowner for the Alcemi Option land is now Thornbush Energy Limited.

Alcemi are supportive of the N2T scheme but wish to ensure that their continued collaboration is formalised with NGET to ensure that the Brunfort BESS scheme and the N2T scheme can both come forward successfully without unforeseen impacts arising. This representation sets out the current status of discussions between Alcemi and NGET, as well as setting out the potentially affected plots.

Alcemi also note that the Landowner is submitting their own relevant representation which Alcemi have not had sight of. This deals with their wider interests around Bramford Substation, including the Alcemi Option land.

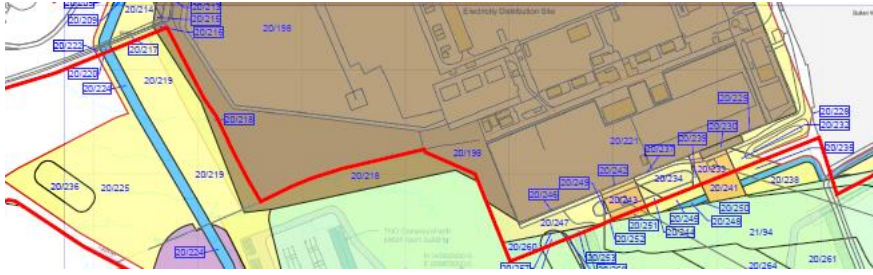
Compulsory Acquisition

The Book of Reference and Land Plans show the proposed rights to be acquired over Alcemi Option land.

While there is only one plot within the Alcemi Option land where permanent acquisition of land is proposed, there are a number of plots where either permanent or temporary acquisition of rights is proposed.

Class 1 Compulsory Acquisition of Land (Brown):

There is one plot, 20/218, where permanent acquisition is proposed which overlaps with the Alcemi Option land. This is shown on the plan excerpt below, where the entirety of plot 20/218 appears to sit within the Alcemi Option land red line:



Alcemi are looking to understand what is proposed for this area and how it may affect their project. Could a lesser right perhaps be acquired here, so as not to interfere with the Alcemi Option land?

Class 2 Compulsory Acquisition of Rights – Overhead Line (OHL) (Green): 20/231, 20/240, 20/254, 20/261, 20/262, 20/263, 20/264, 20/268, 21/94

Class 3 Compulsory Acquisition of Rights – Underground Cable (UGC) (Orange): 20/251, 20/270

Class 4 Compulsory Acquisition of Rights – OHL / UGC (Grey): 20/269 (part only)

Class 5 Compulsory Acquisition of Rights – Access (Blue): 20/248, 21/100

Class 6 Compulsory Acquisition of Rights – Drainage (Purple): 20/255, 20/271

Class 9 Temporary Use (Yellow): 20/219, 20/238, 20/245, 20/265, 20/266

For all of the plots listed above where rights are being acquired, Alcemi require confirmation that these rights, once exercised by NGET, will sit alongside existing rights in the land and will not sterilise those areas from future development. In particular, Alcemi are looking for assurances that the acquisition of the intended rights will not impede the exercise of the Alcemi Option, nor prevent the delivery of the Brunfort BESS. This is particularly important for rights in relation to OHL or UGC, where Alcemi intend to install infrastructure below or above NGET's infrastructure (e.g. plots 20/240 and 20/268, among others).

Interface Position Statement

As noted above, since late 2023 Alcemi and the NGET N2T Project Team have been working together on an Interface Position Statement. The purpose of the Interface Position Statement is to identify and set out an agreed position for likely interfaces between the projects, as well as a mechanism to ensure ongoing collaboration for the resolution of any potential issues associated with these interfaces, securing minimal interference between the two projects. This is an iterative document which it is intended will continue to be adjusted as both projects come forward.

As much of the discussion around the current iteration of the Interface Position Statement (dated April 2025) took place pre-submission of the NGET N2T DCO application, further discussions are underway to reflect NGET's submitted N2T plans.

The identified interfaces between the projects are:

- Permanent infrastructure to be sited in fields immediately south of the existing National Grid Bramford substation;
- Permanent and temporary access and construction land requirements that are potentially overlapping or with potential for sequential occupation;

- Environmental mitigation requirements;
- Ecological surveys to support application submissions;
- Future construction requirements; and,
- Future maintenance requirements.

From the discussions on the Interface Position Statement, both the Alcemi and NGET N2T Project Teams have incorporated certain design changes and agreed the importance of continuing engagement. A set of Co-operation Principles are included which it is intended will govern the ongoing collaboration.

Deed of Undertaking

Alcemi have also proposed a draft Deed of Undertaking, currently with NGET for review, to formalise their discussions to date and to provide a framework for future collaboration, as well as any future legal or property agreements which may be needed to reflect the position which is agreed.

The draft Interface Position Statement and Deed of Undertaking both identify a 'Functional Development Zone' for the Brunfort BESS (as well as Overlap Areas) within which NGET will not appropriate or take possession of any land without the agreement of Alcemi. Conversely, the draft Interface Position Statement and Deed of Undertaking both identify a 'NGET Easement Area' within which Alcemi undertake not to encroach other than to deliver agreed environmental mitigation.

In terms of specific areas of collaboration, the Deed of Undertaking sets out the need for agreement over:

- NGET construction haul road details and their project timescales;
- the detail of Alcemi's environmental mitigation areas, ensuring pylon access is maintained;
- ecological survey information;
- construction phasing for both schemes; and,
- future maintenance and related access for both schemes.

It is noted that the Outline Landscape and Ecological Management Plan (document 7.4) confirms, at paragraph 9.7.1, that NGET / the N2T scheme does not require an 'Environmental Area' within the area surrounding the existing National Grid Bramford substation due to the lack of space in its vicinity. This is as a result of other planned developments in the area, of which the Brunfort BESS is one. Alcemi welcome this confirmation and will continue discussions with the NGET N2T Project Team on the environmental mitigation strategies being proposed for Brunfort BESS.

Ongoing Discussions

As stated above, discussions continue between Alcemi and the NGET N2T Project Team. It is expected that these will continue while the Alcemi proposals for Brunfort BESS are finalised for submission, and then throughout the further detailed design and construction programme for each project.

In land terms, we note that Pre-Application Land and Rights Negotiation Tracker (4.4) sets out that an early engagement letter and Heads of Terms have been issued to Olive Ann Godbold in relation to her interests but at the time of submission no discussions had begun. Alcemi would expect to be kept informed of any discussions affecting the Alcemi Option land (per the plot numbers set out above) and will also be liaising with the Landowner in this regard.

Alcemi requests that the Examining Authority treats Alcemi as an Interested Party for the purposes of the Examination, and reserves the right to produce additional material in relation to their ongoing discussions with NGET and the Landowner as the Examination progresses.

Addleshaw Goddard LLP

Submitted via PINS portal 27.11.25