

Brickkiln Farm Solar Limited  
National Grid Electricity Transmission Norwich to Tilbury Development Consent Order

Interest Party Reference: [REDACTED]

Dear Sir or Madam,

I write on behalf of Brickkiln Farm Solar Limited ("Brickkiln") in respect of the Examination of the application by National Grid Electricity Transmission ("NGET") for development consent for its Norwich to Tilbury project ("the Proposed Development").

This Written Representation supplements Brickkiln's Relevant Representation (Examination Library ref. RR-0406) submitted during the pre-examination phase and its earlier statutory consultation responses. Since those submissions, Brickkiln has continued to engage constructively with NGET and its agent, Fisher German. However, despite that engagement, key technical and construction information necessary to enable a full and accurate assessment of the impact of the Proposed Development on Brickkiln Solar Farm has not yet been provided.

#### Context

Brickkiln is the owner of the operational Brickkiln Solar Farm, a 4.99 MW generating station located southeast of Mulbarton. The continued safe and uninterrupted operation of the solar farm is fundamental to its commercial viability and to national renewable energy objectives.

Brickkiln supports the delivery of nationally significant transmission infrastructure, such as the Proposed Development, in principle. However, Brickkiln does not agree with the parts of the Proposed Development identified in the Relevant Representation and referred to herein which compromise the safe operation, electrical integrity, and commercial viability of Brickkiln Solar Farm.

#### Engagement and Outstanding Information

Brickkiln's Relevant Representation (Examination Library ref. RR-0406) noted that a site meeting took place on 9 September 2025 between NGET and Fisher German, Quintas Energy (acting for Brickkiln) and the freehold landowner. The Relevant Representation sets out the information that was requested at that meeting, namely: detailed technical information, including precise conductor heights, confirmed pylon coordinates, detailed construction methodologies, access and haul road layouts, mitigation measures relating to earthing and shading, and full details of the proposed diversion of the 11 kV export line.

This information remained outstanding as at the date of the relevant representation (27 November 2025). Unfortunately, the information remains outstanding as at the time of writing (26 February 2026). A further meeting did take place on 13 February 2026 between the parties but as NGET and Fisher German were unable to provide the requested information at that stage limited progress was able to be made in addressing Brickkiln's concerns.

Without such information, Brickkiln cannot meaningfully assess construction phase impacts, long term operational implications, electrical safety risk, or the adequacy of proposed mitigation. Accordingly, Brickkiln maintains its objection to the inclusion of any operational land or apparatus at Brickkiln Solar Farm within the Order Limits.

#### Earthing and Electrical Safety

Brickkiln acknowledges that NGET has indicated that pylon RG14 may now be located outside the operational boundary of the solar farm. This amendment is welcomed in principle as it reduces the most severe earthing risk previously identified. However, critical technical evidence remains outstanding. Brickkiln requires confirmation of the finalised spatial coordinates for pylon RG14, clearance distances to the solar farm's perimeter earth conductor, and the results of a full earthing interaction and coupling study demonstrating that no step or touch potential will be transmitted into the solar farm's earth grid and associated cabling. Confirmation of compliance with relevant electrical safety standards is also required.

Until this information is supplied and independently reviewed, Brickkiln cannot confirm that residual safety risks have been eliminated.

#### Construction Phase Impacts

The proposed conductor alignment crosses over operational panel tables. These structures are fragile and at risk of damage during stringing and construction works. Construction above operational infrastructure may also require temporary generation isolations, resulting in loss of export and financial loss.

Brickkiln requires detailed method statements, confirmation of programme duration for works affecting the site, clarification as to whether temporary removal of panels is anticipated, and a full indemnity for any damage and consequential losses arising from construction activities. The requested information has not been supplied and no indemnity has yet been agreed.

Consultation plans show haul roads and working areas overlapping operational infrastructure at Brickkiln Solar Farm. Brickkiln requires: revised access routes and working areas that avoid panelled land; confirmation that unrestricted 24 hour operational access will be maintained for Brickkiln and its agents, contractors, and employees at all times; and confirmation that no permanent sterilisation of productive land will occur without Brickkiln's prior agreement.

#### Long Term Operational Impacts

Even if pylon positioning is revised, shading from conductors and associated infrastructure may reduce generation output. Brickkiln requires final span and height designs to enable proper modelling and requests that NGET fund an independent shading assessment. Any demonstrated generation loss must be appropriately compensated by way of indemnity. Such designs, assessment, and indemnity have not yet been provided.

Construction activities may also increase dust deposition and cleaning requirements. Brickkiln requests confirmation that any additional cleaning, monitoring or operational costs incurred as a result of the Proposed Development will be reimbursed. NGET has not yet provided such confirmation.

#### Diversion of the 11 kV Point of Connection

The proposed diversion of the 11 kV export line represents a serious operational risk. This line is the solar farm's sole export route to the distribution network. Brickkiln understands that any diversion will require outages and interrupt electricity export, resulting in financial loss.

Brickkiln requires full details of the diversion design, construction programme and anticipated outage duration, together with confirmation that continuity of grid connection will be protected throughout construction and operation. Such

information has been requested but has not yet been provided by NGET.

Brickkiln also requires a legally binding indemnity covering generation losses, additional operational costs, grid related liabilities, professional fees and consequential business losses arising from the diversion works. No such indemnity has been agreed.

Current Position

Brickkiln remains committed to engaging constructively with NGET and its advisers. However, critical technical information has not yet been provided. As a result, risk assessments cannot be completed and mitigation measures cannot be evaluated.

Brickkiln therefore maintains its in principle objection to the inclusion of any operational land or apparatus within the Order Limits unless and until the requested information is supplied, appropriate mitigation is agreed, and full indemnification arrangements are secured as detailed in Brickkiln's Relevant Representation.

The Examining Authority is respectfully requested to require NGET to provide the outstanding information as soon as possible during the Examination. The Examining Authority is also respectfully requested to require NGET to enter into legally binding mitigation and indemnification arrangements prior to the grant of development consent or to provide for entry into such arrangements as a pre-commencement requirement in the DCO.

Brickkiln reserves the right to maintain its objection to the Proposed Development should satisfactory protections not be secured during Examination. It also reserves the right to submit further representations as additional information becomes available.

Yours faithfully,

  
Senior Land Manager  
Quintas Energy UK Ltd  
On behalf of Brickkiln Farm Solar Limited