

Written Representation of Innova Renewables Limited

Also incorporating comments on ISH1 and CAH1 and the Statement of Common Ground

We write on behalf of Innova Renewables Limited (IR). IR has two [REDACTED] reflecting the two of their renewable energy assets which will operate through subsidiary special purpose vehicles. One asset is the consented solar farm at Parkgate near Rivenhall and the second is the consented battery energy storage system (BESS) called Hall Farm, adjacent to the Norwich Main Substation.

IR has submitted relevant representations (RR) as part of the DCO process and it continues to rely on these.

IR attended the first CAH as an observer. IR does not have any comments to make on this hearing given its high-level subject matter and how the hearing was focussed on the Applicant's case for compulsory acquisition (CA). IR endorses, however, the Applicant's position that, from a CA perspective, it needs to continue to refine its approach and is under a duty to limit its reliance on CA as much as possible. Clearly where CA powers are not required then these should not be included in the DCO.

IR attended and participated in the first ISH. Whilst this was predominantly focussed on the Applicant's case, IR's representative spoke in respect of matters which concern the interrelationships between the proposed NSIP and IR's consented assets. IR is, and remains, at pains to stress that it is not content with the Applicant's approach to placing infrastructure on its sites and seeking CA rights over its land, particularly where there is no justification for doing so. This is particularly so at Hall Farm where, by the Applicant's own admission, the Applicant does not need CA rights over a large area of IR's land (which IR refers to as the Eastern swathe). IR's position is that this area of land should be removed from the DCO and it should not be used a bargaining chip to bolster the Applicant's position in negotiations over infrastructure siting on IR's land when it is not required for the scheme in the first place.

In terms of other interfaces, as detailed in IR's RR, IR is pleased that discussions continue positively on Parkgate and that a solution may be achievable. These discussions are at an early stage in terms of feasibility and engineering and they need to crystallise into an agreement with IR. IR will keep the ExA updated on progress as things advance in this respect. In terms of Hall Farm, however, whilst negotiations continue, they need to progress quicker in terms of resolving the potential on-site interactions. IR maintains that it kept the Applicant updated on the progress of its planning application for its BESS development; provided layout plans as well as the final approved layout prior to the Applicant's submission of the DCO application. As such, not only should the Applicant have avoided infrastructure interactions with Hall Farm but it also should not have included the Eastern swathe within the Order Limits (the Eastern swathe also includes CA powers which are not necessary, reasonable, proportionate etc. and in essence fail all of the statutory CA requirements). IR encourages the Applicant to engage with IR and to crystallise any on-site infrastructure interfaces into a written agreement that manages these interactions. Again, IR endorses the Applicant's position on CA outlined in CAH1 that it should refine its CA strategy and remove superfluous requirements from its CA strategy.

Finally, to re-iterate again, the Hall Farm BESS development is over 100MW and IR/its subsidiary operating company has applied for a generation licence to operate the site, and this is expected to be issued imminently by Ofgem. As such, IR/its subsidiary operating company should be treated as a statutory undertaker for the purposes of the DCO.

Finally, we note the need for the Applicant to provide the Interrelationship Report and we look forward to reviewing this (albeit, IR's comments in this representation should be reflected in that document in terms of progress and status of the ongoing discussions between IR and the Applicant).

Finally, in respect of the statements of common ground with IR [APP-112], again, IR's position remains that set out in its RR and this response. IR is content to progress the SoCGs with the Applicant but it considers settling the issues in hand to be a pre-requisite to agreeing this.