

Aura Power Written Representation in response to an APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE NORWICH TO TILBURY PROJECT PINS REF: EN020027

Dated 26/02/2026

1. Context:

- 1.1. Marsh Lane Solar Farm is a 30MWac ground-mounted solar PV development situated near Diss, Norfolk (Solar Project).
- 1.2. Aura Power Developments Ltd (Aura Power) holds the land, grid, and planning rights for the Solar Project and intends to commence construction during 2027.
- 1.3. Planning approval for the Solar Project was granted following a cross boundary application, determined by Mid-Suffolk District Council and South Norfolk District Council.
- 1.4. Mid-Suffolk District Council Planning Committee resolved unanimously to approve the Solar Project in April 2025, with the Decision Notice issued on 13th August 2025 (LPA ref: DC/23/05426).
- 1.5. Planning permission for the underground cable route connecting the Solar Project to Diss BSP, was granted in April 2025 under delegated powers by South Norfolk District Council (LPA ref: 2023/3574).
- 1.6. A copy of the approved Solar Project Layout Plan is shown in Figure 1, and a copy of the approved Location Plan that also shows the Solar Project's underground cable route is shown in Figure 2.

Figure 1: Solar Project Layout Plan

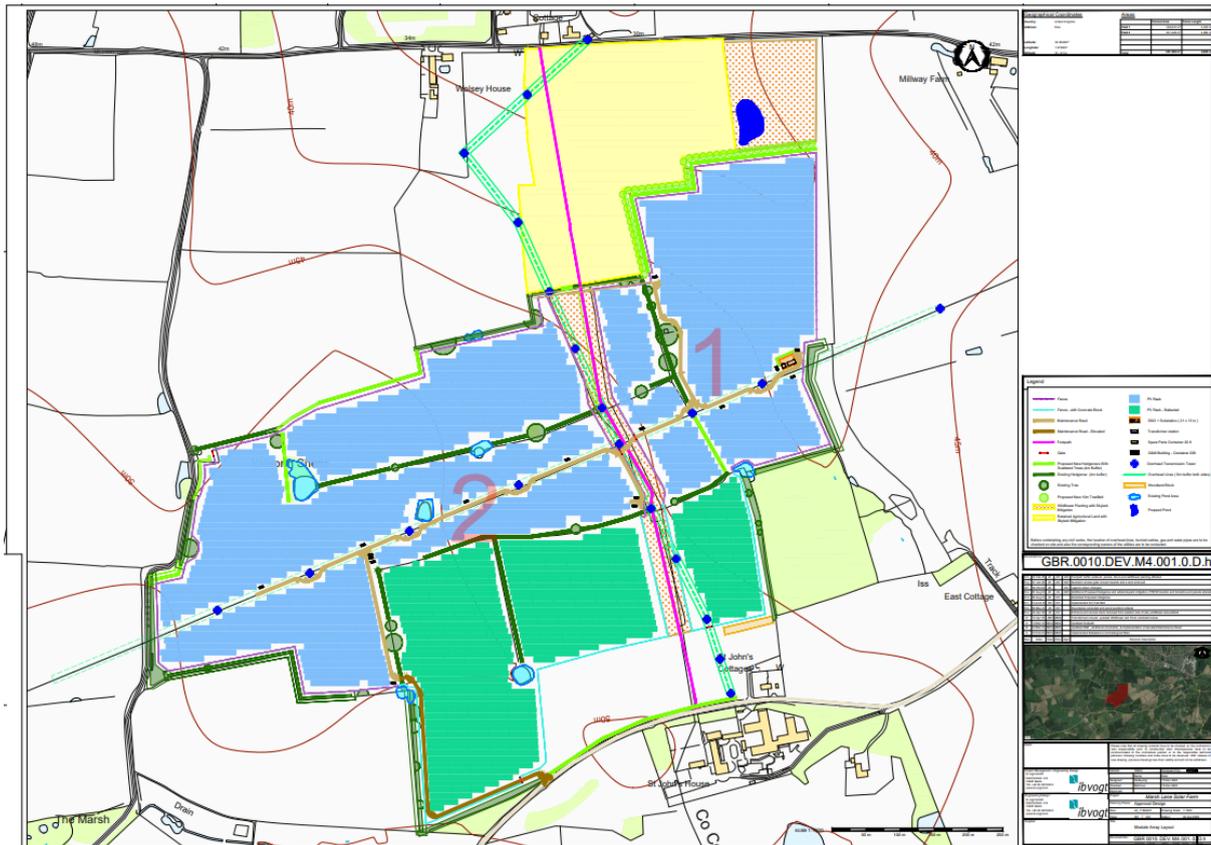
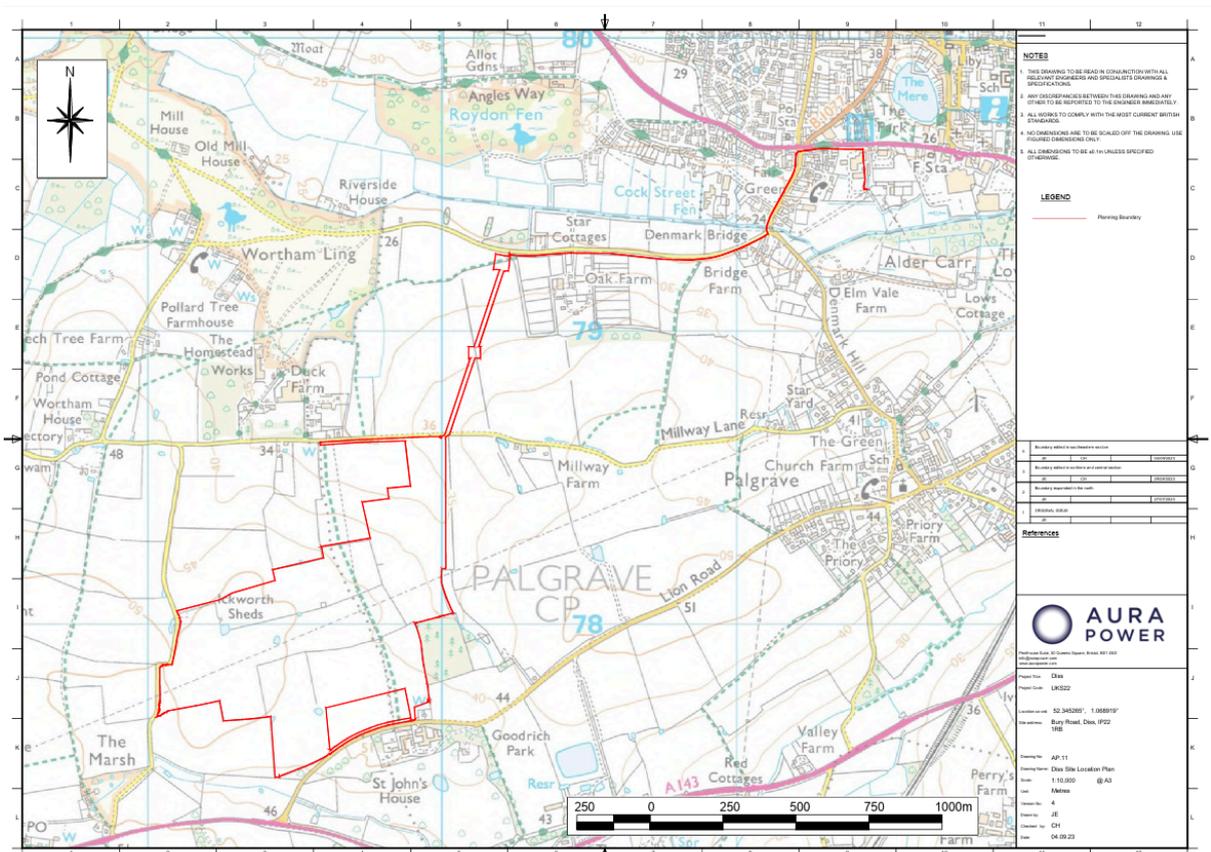


Figure 2: Solar Project Location Plan (including underground cable route to Diss BSP)



2. Interaction of the Norwich to Tilbury Project (Pylon Project) with the Solar Project:
- 2.1. We have reviewed Sheet 1 of the “EN020027-000561-2.2 Land Plans - Section B” and Sheet 1 of the “EN020027-000250-2.3 Works Plans - Section B” and Sheet 1 of “EN020027-000266-2.5 Access Rights of Way and Public Rights” documents included within the Pylon Project’s DCO application, as well as the “2025 DCO Submission” version of the Norwich to Tilbury interactive map displayed on National Grid’s website (accessed on 25th February 2026) with screenshot of this shown in Figure 3 below.
- 2.2. These plans show the Pylon Project interacting with an area of the north eastern part of the Solar Project as well as the Solar Project’s underground cable route, affecting title numbers SK176181 & SK113952 & SK129903 which Aura Power holds legal charges against title over in the form of an Option for Lease agreement in favour of an Aura Power subsidiary, Haedus Solar Limited (Co. Reg. No. 13663837).
- 2.3. During the construction phase, Aura Power understands the plans currently indicate that interaction with the Solar Project and its underground cable route would involve, but not be limited to:
- 2.3.1. compulsory acquisition of rights for the construction of a “Primary Access Route” that is understood to be an approx. 20 metre wide temporary construction haul road, together with temporary access for scaffold installation and a crossover bellmouth access point off Millway Lane with visibility splay (“RG-B061”); and
- 2.3.2. compulsory acquisition of rights for a new permanent pylon (“RG91”) together with access rights from Millway Lane to the pylon; and
- 2.3.3. compulsory acquisition of rights for access to pylons RG90 & RG89; and
- 2.3.4. compulsory acquisition of rights for undergrounding of the existing 11kV overhead line within proximity of new pylon RG92
- 2.4. Once construction is complete, Aura Power understands the plans indicate that the long-term interaction of the Pylon Project with the Solar Project and its underground cable route would include, but not be limited to:
- 2.4.1. the new permanent pylon RG91 located within the Solar Project site; and
- 2.4.2. permanent access rights to new pylons RG91 & RG90 & RG89 as well as any ongoing rights needed for access and maintenance of the new overhead line and the existing 11kV overhead line near RG92 that is proposed to be relocated underground.
- 2.5. The Pylon Project’s plans as currently proposed will therefore have a material impact on the Solar Project, its underground cable route, and its proposed areas for BNG and ecological mitigation.

Figure 3: Screenshot of “2025 DCO Submission” from the Norwich to Tilbury Interactive Map



3. Compensation for Loss or Damage:

- 3.1. Where DCO powers to acquire land and rights in land compulsorily are exercised, any loss or damage caused to landowners, occupiers and those with another interest in land by the exercise of the powers is compensable.
- 3.2. Should land that Aura Power has rights over be acquired (either temporarily or permanently) by the Pylon Project, Aura Power outlines its position that it will be entitled to compensation for all costs and loss of revenue related to any land taken and any impact the Pylon Project has on the Solar Project and its underground cable route. This compensation will need to recognise that following the grant of planning permission, alongside work to discharge planning conditions in 2026 and work to commence construction in 2027, the Solar Project is committed to development.

3.3. Compensation would include, but not limited to:

- 3.3.1. Land/Rights acquisition cost
- 3.3.2. Loss of development value
- 3.3.3. Disturbance
- 3.3.4. Injurious affection
- 3.3.5. Severance
- 3.3.6. Legal and professional fees
- 3.3.7. Statutory Loss payments

4. Summary of Aura Power's Position:

- 4.1. Aura Power generally supports projects that will improve the transmission of electricity within the UK so long as such projects provide best value for money for consumers, and ultimately UK taxpayers.
- 4.2. Aura Power submitted the planning application for its Solar Project in November 2023 and engaged with National Grid during the early development phase of the Pylon Project. Aura Power welcomed the relocation of two towers following those discussions, however the proposed construction haul road and proposed acquisition of access rights outlined in 2.2 - 2.4 will have a material impact on the operation of the Solar Project.
- 4.3. The Solar Project was known to National Grid and received planning permission prior to the Pylon Project submitting its DCO application on 29th August 2025.
- 4.4. Aura Power firmly believes that an alternative route should be sought for the construction haul road ("Primary Access Route") over undeveloped land to completely avoid its impact on the Solar Project, which is committed development, and the significant compensation that will result from the currently proposed interference with the Solar Project.
- 4.5. Aura Power objects to the location of the proposed works shown in Figure 3 on the basis of the points outlined in 4.2 - 4.4 as the proposed works do not provide best value for money for consumers and UK taxpayers who will ultimately have to fund an avoidable significant additional cost in the form of consequential compensation that would become payable to Aura Power to reflect the impact of incurred costs and lost revenue for the Solar Project.



NOTES

- 1. THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEERS AND SPECIALISTS DRAWINGS & SPECIFICATIONS.
- 2. ANY DISCREPANCIES BETWEEN THIS DRAWING AND ANY OTHER TO BE REPORTED TO THE ENGINEER IMMEDIATELY.
- 3. ALL WORKS TO COMPLY WITH THE MOST CURRENT BRITISH STANDARDS.
- 4. NO DIMENSIONS ARE TO BE SCALED OFF THE DRAWING. USE FIGURED DIMENSIONS ONLY.
- 5. ALL DIMENSIONS TO BE $\pm 0.1m$ UNLESS SPECIFIED OTHERWISE.

LEGEND

 Planning Boundary

Boundary edited in southeastern section		
JE	CH	04/09/2023
Boundary edited in northern and central section		
JE	CH	29/08/2023
Boundary expanded in the north		
JE		27/07/2023
ORIGINAL ISSUE		
JE		

References

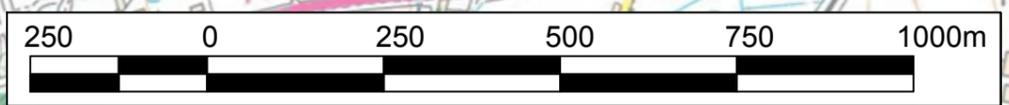


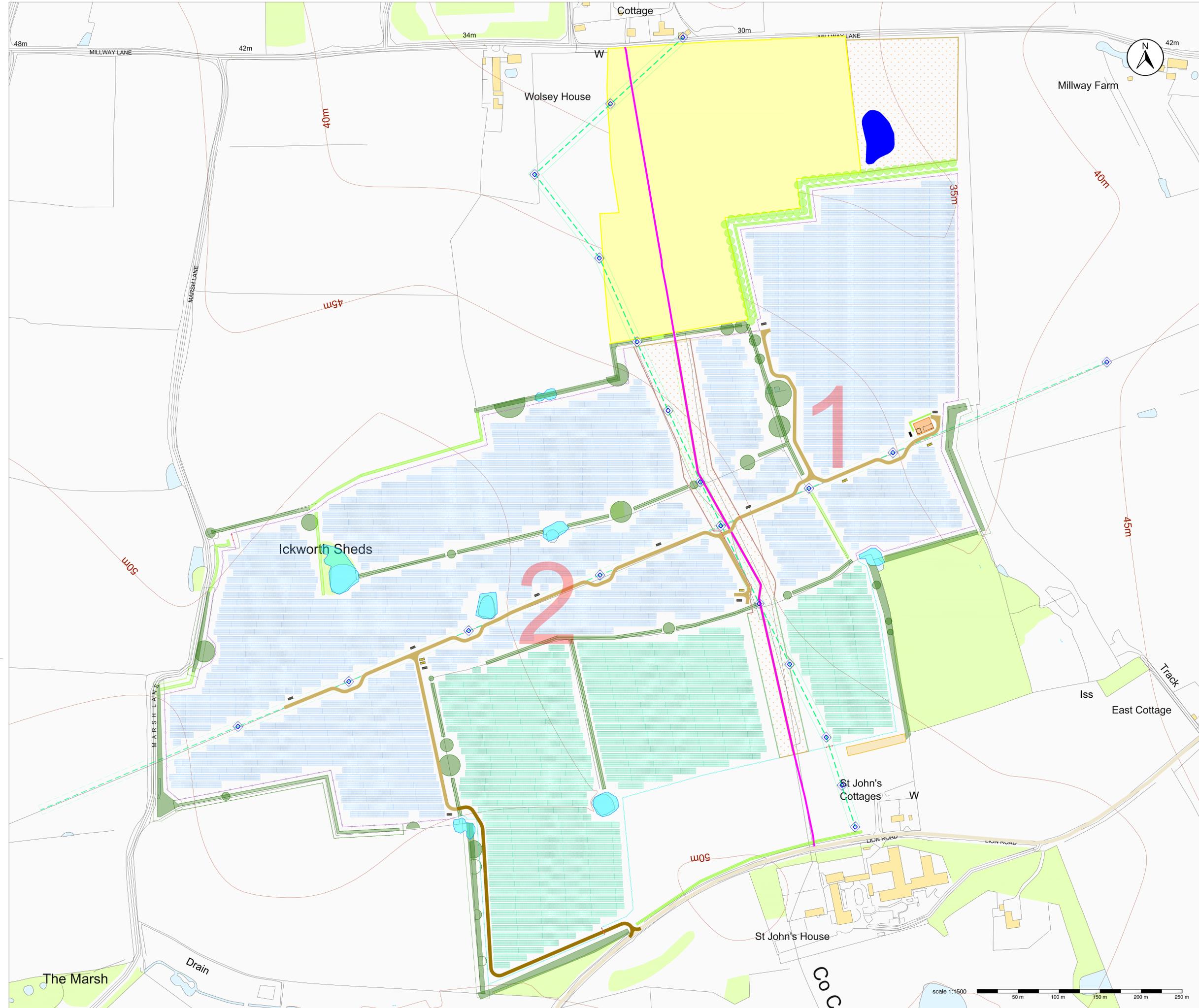
Penthouse Suite, 30 Queens Square, Bristol, BS1 4ND
info@aurapower.com
www.aurapower.com

Project Title: Diss
Project Code: UKS22

Location co-ord: 52.345265°, 1.068919°
Site address: Bury Road, Diss, IP22 1RB

Drawing No: AP.11
Drawing Name: Diss Site Location Plan
Scale: 1:10,000 @ A3
Unit: Metres
Version No: 4
Drawn by: JE
Checked by: CH
Date: 04.09.23





Geographical Coordinates		Areas	
Country:	United Kingdom	Fenced Area	Fence Length
Address:	Dis	Field 1	2,023 m
Latitude:	52.362487°	Field 2	2,882 m
Longitude:	1.079302°		
Altitude:	31.51 m	Total	4,905 m



Legend	
	Fence
	Fence - with Concrete Block
	Maintenance Road
	Maintenance Road - Elevated
	Footpath
	Gate
	Existing Tree
	Proposed New 10m TreeBelt
	Wildflower Planting with Skylark Mitigation
	Retained Agricultural Land with Skylark Mitigation
	PV Rack
	PV Rack - Ballasted
	DNO + Substation (21 x 15 m)
	Transformer station
	Spare Parts Container 20 ft
	O&M Building - Container 20ft
	Overhead Transmission Tower
	Overhead Lines (6m buffer both sides)
	Woodland Block
	Existing Pond Area
	Proposed Pond

Before undertaking any civil works, the location of overhead-lines, buried cables, gas and water pipes are to be checked on site and also the corresponding owners of the utilities are to be contacted

Documentation

GBR.0010.DEV.M4.001.0.D.h

Rev.	Date	Des.	Chg	Appr.	Revision Description
D.5	04 Feb 23	JE	AD	GW	Footpath buffer widened, panels, fence and wildflower planting affected
D.4	27 Jan 23	JE	AD	GW	Southern access gate moved inwards and a rack removed
D.3	04 Oct 24	JE	CH		Legend colour changed
D.2	22 Aug 24	JE	JG	GW	Additional Proposed Hedgerow and add skylark mitigation, PROW location and fence line and panels altered
D.1	25 Aug 23	JE	CH		Extended Proposed Hedgerow
D.0	14 June 23	AD	CH		Implemented 5m Tree Belt
D.5	09 May 23	JE	CH		Boundaries corrected and panel positions altered
D.4	24 Apr 23	JE	CH		Entrance and access track removed from western side of site, wildflower area altered
D	13 Apr 23	JBO	MMA		Transformers moved, updated Wildflower and Pond constraint areas
C	13 Mar 23	MCA	MMA		Updated Footpath
B	03 Mar 23	MCA	MMA		Updated KMZ, additional constraints, & implementation of elevated Maintenance Road
A	03 Feb 23	MCA	MMA		Implemented Ballasted on Archeological Sites



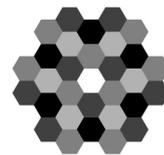
Client: Please note that all drawing contents have to be checked on the contractor's own responsibility prior to construction start. Discrepancies have to be communicated to the contractual partner or to the responsible technical planners. Drawing numbers and index have to be observed. With release of new drawing, previous drawings lose their validity and will not be withdrawn.

Project Management / Engineering Design		Version		European Prsg	
ibvogt GmbH Heinrichstr. 2/4 10287 Berlin Tel: +49 30 397440-0 www.ibvogt.com	Name Date	Metric	1:1500	15 Dec 2022	15 Dec 2022
ibvogt GmbH Heinrichstr. 2/4 10287 Berlin Tel: +49 30 397440-0 www.ibvogt.com	Designed Checked Approved	Author	15 Dec 2022	15 Dec 2022	15 Dec 2022
ibvogt GmbH Heinrichstr. 2/4 10287 Berlin Tel: +49 30 397440-0 www.ibvogt.com	Project	Project	Marsh Lane Solar Farm	Planning Phase	Approval Design
ibvogt GmbH Heinrichstr. 2/4 10287 Berlin Tel: +49 30 397440-0 www.ibvogt.com	Scale	Scale	1:1500	Page	001 / 001
ibvogt GmbH Heinrichstr. 2/4 10287 Berlin Tel: +49 30 397440-0 www.ibvogt.com	Status	Status	22 Aug 2023	Title	Module Array Layout

Document No.: GBR 0010.DEV.M4.001.0.D.h
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The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number SK113952

Edition date 04.07.2022

- This official copy shows the entries on the register of title on 16 DEC 2025 at 14:50:35.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 16 Dec 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Kingston Upon Hull Office.

A: Property Register

This register describes the land and estate comprised in the title.

SUFFOLK : MID SUFFOLK

1 (25.02.1992) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Land on the North side of Millway Lane, Palgrave.

2 (25.02.1992) The land has the benefit of the following rights granted by but is subject to the following rights reserved by a Conveyance of the land in this title dated 11 October 1991 made between (1) Arthur Frank Anness (Vendor) and (2) Russell Ling and Maureen Ling (Purchaser):-

"THE property is transferred with a right of way for the Purchasers and those deriving title under them the owners and occupiers for the time being of the Property and their respective servants and licencees (in common with the Vendor and all other persons having the like right) at all times and for all purposes both with or without vehicles and animals and equipment over and along the strip of land shown coloured green on the plan between the points A and B marked thereon of a sufficient width to enable the passage of agricultural implements and leading between the property and the Wortham Road there but not for any other purpose whatsoever the Purchasers and those deriving title under them the owners and occupiers for the time being of the Property paying a fair proportion according to user of the expenses of maintaining and keeping the said way in repair.

THERE is excepted and reserved out of the Property to the Vendor as appurtenant to the Retained Property the full and free right to enter on the Property hereby transferred with or without workmen and with or without tools and/or materials for the purpose of maintaining the boundary hedges ditches and trees retained by the Vendor and marked by an inward T on the said plan the Vendor causing as little damage or inconvenience as possible to the Purchaser in the execution of such works."

NOTE: The points lettered A and B have been reproduced on the filed plan. The "T" marks have been reproduced on the filed plan.

3 (23.03.2010) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

Title number SK113952

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (17.03.2020) PROPRIETOR: ROOKERY FARM LIMITED (Co. Regn. No. 03198413) of The Rookery, Bury Road, Wortham, Diss IP22 1RB.
- 2 (17.03.2020) The price stated to have been paid on 10 March 2020 was £577,440.
- 3 (04.07.2022) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate , or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction is to be registered without a certificate signed by Haedus Solar Limited (Company Registration Number 13663837) of 30 Queen Street, Penthouse Office, Bristol BS1 4ND or their conveyancer that the provisions of clause 7.3 of an Agreement dated 30 June 2022 made between (1) Rookery Farm Limited and (2) Haedus Solar Limited referred to in the Charges Register have been complied with or that they do not apply to the disposition.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (04.07.2022) UNILATERAL NOTICE in respect of an Agreement for Lease dated 30 June 2022 made between (1)Rookery Farm Limited and (2) Haedus Solar Limited.
- 2 (04.07.2022) BENEFICIARY: Haedus Solar Limited (Co. Reg. No. 13663837) of 30 Queen Square, Penthouse Office, Bristol BS1 4ND.

End of register

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Official copy of register of title

Title number SK129903

Edition date 04.07.2022

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- Issued on 16 Dec 2025.
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- This title is dealt with by HM Land Registry, Kingston Upon Hull Office.

A: Property Register

This register describes the land and estate comprised in the title.

SUFFOLK : MID SUFFOLK

- 1 (27.07.1993) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land on the south side of Ling Road, Palgrave, Diss.
- 2 (27.07.1993) A Conveyance of the land in this title dated 15 July 1993 made between (1) Ruby Margaret Keeley and Ronald Archie Bartrum (Vendors) and (2) Russell Ling (Purchaser) is expressed to grant the following rights. These rights are included in the registration only to the extent that they are legal and not equitable rights.

"TOGETHER WITH (insofar as the Vendors can grant the same) full and free right of way for the Purchaser and his successors in title (in common with all others similarly entitled) at all times by day and night and with or without vehicles and animals as heretofore used and exercised over and along the accessway leading to the property above described from the main road."

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (17.03.2020) PROPRIETOR: ROOKERY FARM LIMITED (Co. Regn. No. 03198413) of The Rookery, Bury Road, Wortham, Diss IP22 1RB.
- 2 (17.03.2020) The price stated to have been paid on 10 March 2020 was £22,560.
- 3 (04.07.2022) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate, or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction is to be registered without a certificate signed by haedus Solar Limited (Co. Reg. No. 13663837) of 30 Queen Street, Penthouse Office, Bristol BS1 4ND or their conveyancer that the provisions of clause 7.3 of an Agreement dated 30 June 2022 made

Title number SK129903

B: Proprietorship Register continued

between (1) Rookery Farm Limited and (2) Haedus Solar Limited referred to in the Charges Register have been complied with or that they do not apply to the disposition.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (04.07.2022) UNILATERAL NOTICE in respect of an Agreement for Lease dated 30 June 2022 made between (1) Rookery Farm Limited and (2) Haedus Solar Limited.
- 2 (04.07.2022) BENEFICIARY: Haedus Solar Limited (Co. Reg. No. 13663837) of 30 Queen Square, Penthouse Office, Bristol BS1 4ND.

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- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 31 Jul 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Kingston Upon Hull Office.

A: Property Register

This register describes the land and estate comprised in the title.

SUFFOLK : MID SUFFOLK

- 1 (06.10.1997) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land comprising part of Rookery Farm, Bury Old Road, Wortham.
- 2 (06.10.1997) A Conveyance of the land tinted pink on the filed plan and other land dated 27 January 1971 made between (1) Leonard Charles Wills (Vendor) and (2) Howard Sydney Earle Dawkins (Purchaser) contains the following provision:-

"The Purchaser shall not be entitled to any right of light or air or easements of any kind over the adjoining property of the Vendor."
- 3 (23.03.2010) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (06.10.1997) PROPRIETOR: ROOKERY FARM LIMITED (Co. Regn. No. 3198413) of Lime Tree Farm, Wortham, Diss, Norfolk, IP22 1PP.
- 2 (04.07.2022) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate, or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction is to be registered without a certificate signed by Haedus Solar Limited (Co. Reg. No. 13663837) of 30 Queen Street, Penthouse Office, Bristol BS1 4ND or their conveyancer that the provisions of Clause 7.3 of an Agreement dated 30 June 2022 made between (1) Rookery Farm Limited and (2) Haedus Solar Limited referred to in the Charges Register have been complied with or that they do not apply to the disposition.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (06.10.1997) The land edged blue on the filed plan is subject to the following rights reserved by a Conveyance thereof and other land dated 31 January 1972 made between (1) Alec Lewis Constance and Ruby Eva Constance (Vendors) and (2) Gerald Paul Rossi and Others (Purchasers):-

Excepting and reserving to the Vendors for the benefit of the land retained by them edged green on the plan annexed hereto to receive and use the supply of water along the land indicated approximately by a blue dotted line on the said plan and the right for them and their successors in title at all times to have access to the said water pipe for all purposes of inspecting renewing repairing and cleansing the same PROVIDED THAT any damage caused thereby to the surface shall be made good by the Vendors together with reasonable compensation for all damage done thereby.

NOTE: The land edged green referred to lies to the east of the land in this title. The blue dotted line referred to is shown by a blue broken line on the filed plan so far as it affects the land in this title.

- 2 (06.10.1997) The parts of the land affected thereby are subject to the rights granted by a Deed dated 14 February 1990 made between (1) David Martin Rossi and Martin Philip Manning Prentice and (2) Robert Terrence Bowden.

NOTE: Original filed.

- 3 (04.07.2022) UNILATERAL NOTICE in respect of an Agreement for Lease dated 30 June 2022 made between (1) Rookery Farm Limited and (2) Haedus Solar Limited.

- 4 (04.07.2022) BENEFICIARY: Haedus Solar Limited (Co. Reg. No. 13663837) of 30 Queen Square, Penthouse Office, Bristol BS1 4ND.

End of register