

We write on behalf of Innova Renewables Limited (IR). We write to provide comments on the Applicant's submitted material at D1 and to provide the ExA with an update on IR's discussions with NG. This representation is made in respect of IR's Parkgate (IP ref: [REDACTED]) and Hall Farm (IP ref: [REDACTED]) projects.

In terms of the new material, neither the Interrelationship Report [REP1-134] nor the Applicant's comments on Innova's representations made at ISH1 [REP1-132] take matters further forward. More explicitly, the Applicant has not addressed IR's concerns at all.

In respect of IR's Hall Farm BESS project, NG once again notes that justification for inclusion of the Eastern swathe (as referred to by IR, see [REP1-243]) is based on the BESS project not coming forward. However, the Design Development Report [APP-122] notes that the scheme's alignment is subject to IR receiving consent for the BESS project. IR has that consent and expects the Applicant to remove the Eastern swathe from the Order Limits as there is now no justification for its inclusion; contrary to its own case and justification for seeking CA powers. Of significant concern to IR is the Applicant's current approach in negotiations of using the removal of the Eastern swathe from the Order Limits as leverage to incur more significant impacts on IR's consented infrastructure (near RG4). IR's position is that the Eastern swathe should be removed from the scheme and that interfaces with its site in and around RG4 should be avoided and resolved by the Applicant. In terms of REP1-134, clearly the Order Limits interact with IR's consented project (not the other way round as noted by the Applicant).

In respect of Parkgate, IR remains concerned with the reference to panel removal from its site and IR is waiting for a proposal from the Applicant to settle this issue. IR has received the interface agreement letter from the Applicant and is considering this.

In terms of the Applicant's comments on the RRs [REP1-132] this is wholly inadequate and the Applicant has not responded to any comments made by IR to date. Further, no comment has been made regarding IR's status as a statutory undertaker and this needs to be addressed and accounted for. As such, unfortunately, little progress has been made by the Applicant in respect of the concerns raised by IR in written submission and at hearings. Given we are now in March and the DCO application was submitted in August 2025, this is poor progress on the Applicant's part.

IR's negotiations with the Applicant are ongoing. On Parkgate, design solutions are still being considered and, as noted, IR is considering the interface agreement letter referred to by the Applicant. On Hall Farm, there is still significant resistance from the Applicant to amend the interactions it has with IR's consented project. It is unfortunate to see this, as minor changes could resolve these interactions and the Applicant should seek changes to its proposal (as it has done elsewhere during the course of the Examination e.g. its Proposes Change Applications). It should not be for IR to amend its consented proposal, which is a suggestion that has been made by the Applicant.

IR again reserves its position on the SoCG for its projects and notes the submission of a further SoCG in respect of Parkgate [REP1-088].

IR will keep the ExA updated but to date progress has been very limited and the Applicant has not addressed the comments raised by IR.