

We write on behalf of Innova Renewables Limited in respect of the ExA's first written questions, particularly question GEN1.13. This is directed to Pivoted Power, albeit we consider this was meant to be directed at Innova. Innova has referred the ExA to the matter raised previously in its RR (27 November 2025), WR (REP1-243), at the first CAH and in post-hearing submissions (REP2-051). We continue to seek justification for the inclusion of the eastern swathe in the Order Limits (land parcel 1/3). To date no response has been provided to Innova by the Applicant despite the application having been submitted 8 months ago and the planning permission for Innova's Hall Farm BESS project having been granted in July 2025.

Notwithstanding this, to recap again, planning permission was granted on 25th July 2025 for Innova's Battery Storage project at Hall Farm by South Norfolk Council under reference 2024/3750. That project is located south of Norwich Main substation and is located immediately beneath the 'eastern corridor' of the Applicant's proposed overhead line corridor south of the substation. A plan showing the area of this consented project was provided by Innova with its RR. As we understand it, there is a project owned by Pivoted Power nearby, on the opposite side of the rail line, that sits outside the order limits.

Innova has sought clarification from the Applicant as to why the widened Order Limits are being sought in this location, crossing the consented BESS project. It seems clear from the application documents that the widened Order Limits were included to provide an alternative overhead line route in the event that planning permission was not granted for Innova's project (see the Applicant Design Development Report (APP-122)). Planning permission was, however, granted for Innova's project prior to the Applicant's DCO submission being submitted and the Applicant was well aware of Innova's design layout well in advance of consent being granted for the BESS.

Innova's position is that the rights sought over the eastern corridor are not required, justified or reasonable and - given planning permission was granted for their project prior to the DCO application being submitted - CP powers should not have been included in the Applicant's DCO. To reiterate again, Innova's BESS project is over 100MW meaning Innova needs a generation licence to operate the project. This renders Innova a statutory undertaker under the Electricity Act 1989. By way of update, OFGEM granted a generation licence on 2 April 2026 to Innova's subsidiary called Hall Farm Solar BESS Limited and imposing rights over Innova's site is likely to cause serious detriment to its statutory undertaking.

Innova would further like to note that the Applicant's Interrelationship Report (REP1-134) does not account for either of Innova's projects – the Hall Farm BESS or its Parkgate solar farm. Innova considers the report should be updated to reflect the interfaces with projects, explain its approach to resolving/managing issue and to assist the ExA's understanding of the impacts of the proposals on Innova's consented projects.