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Ashfords LLP writes on behalf of Innova Renewables Limited (IR) regarding their approved Hall Farm BESS development and their approved Parkgate solar farm.

To date Innova has submitted its Relevant Representation (on 27 November 2025), its Written Representation [REP1-243], appeared at CAH 1 and provided a summary of its points [REP1-132], submitted post-hearing submissions [REP2-051] and provided a response to the Examining Authority's First Written Questions [REP3-115]. To date IR has had no substantive response to the concerns it has raised, nor did NG address these points at CAH2.

This is a summary of the oral representations made on behalf of IR at CAH2 and it also provides further clarification and wider updates in respect of points made to date.

1. The N-T project interacts with two of Innova's projects:
 - a. Hall Farm (a 400MW battery project, located to the south of Norwich substation). It was consented on 25th July 2025 and an approved layout plan has been submitted into the examination at the written reps stage; and
 - b. Parkgate (a circa 23MW solar farm located to the north of Rivenhall) consented Dec 2023 and an approved layout plan has been submitted into the examination as well, again at the written reps stage.
2. N-T interacts with both projects and both are within the Order Limits and are subject to powers of compulsory acquisition (CA). IR disputes the use and extent of the CA powers sought over its interests for the reasons set out below.
3. It should be noted that IR (through its subsidiary Hall Farm Solar BESS Limited) is a statutory undertaker by virtue of the generation licence issued by Ofgem on 2 April 2026. In respect of that site, IR considers the proposal will cause serious detriment to its undertaking (as per s.127 of the PA) because it will limit (potentially severely or entirely) its ability to operate should the BESS infrastructure be impacted. This point has not been addressed by the Applicant in its response to D2 submissions [REP3-070], nor did it reply to the point at CAH2 preferring instead to reply in writing at Deadline 4.
4. At CAH2, IR made the following points:

HALL FARM

In respect of Hall Farm – there will be project overlaps and there are two main issues.

1. Issue 1 - Eastern Swathe

The first issue relates to the Eastern Swathe of land. Despite NG knowing about IR's consented scheme before it submitted the DCO application (and the overlaps), this land remains in the Order Limits. This is of significant concern to IR. This area of land includes the main BESS facility and CA powers are sought over almost its entirety (See Plate 1 below). NG's position is that this land was included in the scheme as a 'just in case'. That 'just in case' position being founded on IR's battery project not being granted planning permission. This is the position advocated in NG's Design Development Report [**APP-122**].

At Deadline 3, NG provided a self-contradictory response to question GEN1.13 of the ExA's FWQs. In Response to FWQs [**REP3-074**] NG notes that *"the option to utilise the eastern corridor, within the current DCO order limits, may be one the Applicant seeks to investigate further if of benefit to either party pending the outcome of the ongoing attempts to reagree a design solution."* This is a material shift in justification on NG's part which it has not explained (and failed to at CAH2) and is not something that IR can ever support. There was no agreement previously to the layout of IR's scheme, as there was no requirement for there to be one.

There is no conceivable benefit to IR that could result from overhead lines spanning its approved BESS project. Nor is there a realistic argument to suggest that a failure to find a solution to the project interfaces in the western portion of the site (see Issue 2 below) warrants the occupation of the entirety of the main BESS infrastructure. In any event, it is disputed that NG can now seek to shift its position in this way and at this late stage. Given the planning permission for Hall Farm was granted before the N-T application was submitted, the use of the Eastern Swathe is clearly not needed and should be removed from the DCO. It also should not be used as some sort of leverage or bargaining position by NG as justification to permit interactions on the western portion of the Hall Farm site given its inclusion in the DCO is entirely unjustified.

IR respectfully asks that NG commits to no longer seeking these rights, in line with what they have communicated directly to IR in previous discussions and in line with their own written explanation detailing why the Eastern Swathe was included in the DCO in the first place i.e. those rights were only sought in the event that Hall Farm did not receive planning permission. To highlight how extensive the CA powers sought over Hall Farm are, please see Plate 1 below.

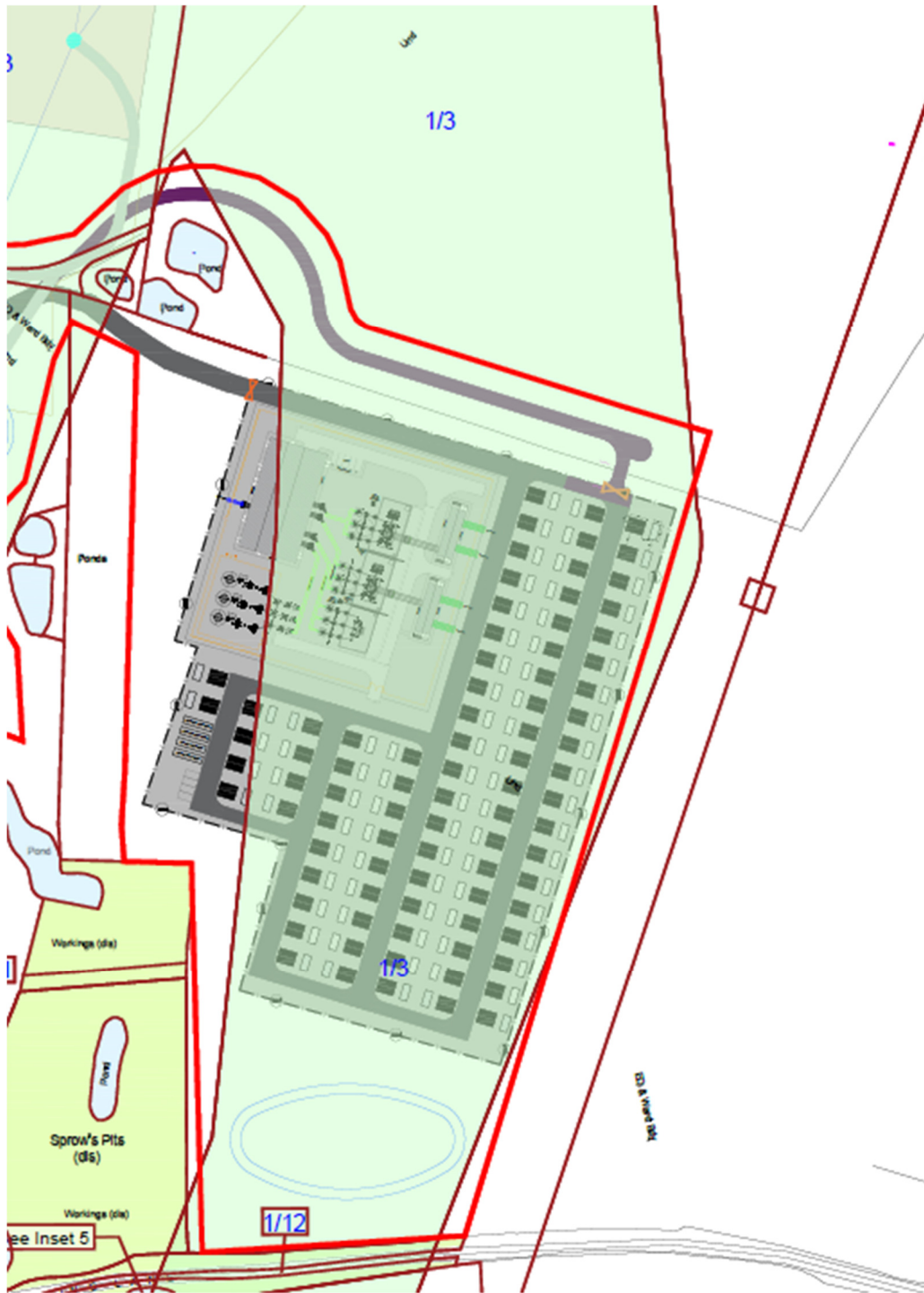


Plate 1: Indicative overlay of N-T Order limits over IR's Hall Farm main BESS Dev Area

2. Issue 2 - NG Temporary haul road, Pylon RG4, IR flood attenuation basin

The second issue relates to project interfaces in the western portion of IR's site (See Plate 2 below). As it stands, NG is proposing to locate pylon RG4 and the temporary haul road in a consented flood attenuation pond. NG's scheme will also have cross-overs with IR's consented main access and underground cabling which runs north towards the substation. There is a simple workaround to resolve a number of the on-the-ground conflicts.

NG has proposed to move RG4 up to 35m to the south, removing the physical interface between this tower and the approved attenuation pond. This is welcomed by IR but it needs to be secured by an agreement between IR and NG.

Whilst NG has been amenable to moving RG4, it is reluctant to move the haul road (which also interacts with the attenuation pond as shown on Plate 2 below). NG prefers to insist that IR amends its planning permission to accommodate a change in this area but IR is reluctant to seek this; firstly on the basis that IR's consent pre-dates the N-T application as noted above, but secondly because the interaction can be easily accommodated by NG. NG has confirmed that the 20m width area for the haul road can in practice be reduced to 5m. The overlap with the basin is expected to be under 10m. As such, IR maintains that by making a simple, and very minor amendment to the Order Limits, into an area of unconstrained land to the immediate west, it would enable the haul road to be moved, and remove this conflict entirely (in summary it would entail moving ~30m length of haul road ~10m to the west).

IR is mindful that other, and more substantial, change requests have been made by NG during the course of the DCO Examination. These have all, to date, been accepted by the EXA. NG's has explained to IR that such a change request cannot be made in this scenario because it would be 'unduly onerous' from a programme perspective. IR considers this position to be wholly inadequate given the impacts of this interface with its project i.e. consented infrastructure which has been designed specifically to mitigate impacts from the BESS project. Moreover, it is no justification to seek CA powers on the basis that it is too difficult to change the scheme.

As alluded to above, and as NG noted at CAH2, whilst it may be possible to amend the Hall Farm planning permission to accommodate a change to avoid a conflict, IR does not consider that this is the appropriate response for reasons noted. That said, IR has offered to discuss this further with NG if it can offer a simple solution. Such an amendment would of course be subject to technical assessment, acceptability to IR and ultimately agreement with the Local Planning Authority. IR notes this for completeness and without prejudice to its preferred position on this point.

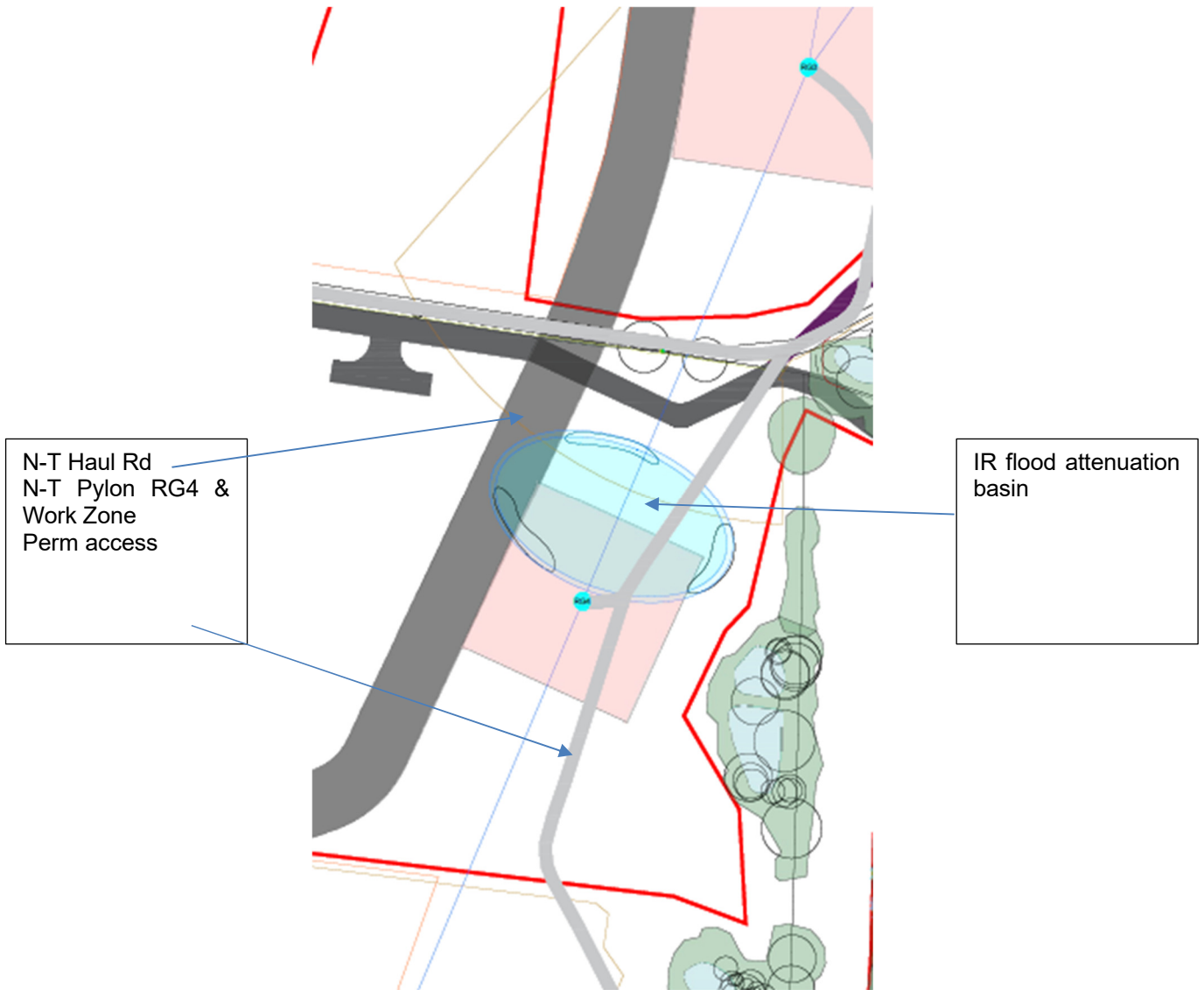


Plate 2: Indicative overlay of N-T infrastructure over IR's Hall Farm flood attenuation basin, showing conflict on the basin's western edge.

Negotiations update (post the CAH2 hearing)

IR emailed NG on 21st April and offered to discuss solutions further (including the solutions noted above). However, to date, no response has been received and there are no further meetings scheduled. IR encourages NG to engage with it on these matters.

PARKGATE

In respect of Parkgate – there are again project overlaps e.g. a pylon is located in the middle of the consented solar panels, a haul road, laydown area and temporary scaffolding along Church Road will impact panels and landscaping.

Given the consent was issued in December 2023, it is unclear to IR why NG has taken the approach it has and sought to impact the consented solar farm in such a way. IR does not consider that NG requires CP powers over the site as there are alternative designs and approaches which could limit the interactions. As such, IR objects to the current extent of CP powers sought over the site.

Negotiations update (post the CAH2 hearing)

That said, negotiations have been positive and are progressing. The parties are in regular contact and have recently agreed updates to the draft SoCG which is being submitted to the EXA by NG at Deadline 12. NG has offered a design solution where there would be no pylon located in the approved solar array, resulting in potentially very limited or no panel loss. The parties are now in active discussion about peripheral physical interfaces between the projects, for example where NGs amended plans will displace areas of landscaping and BNG, sections of fencing/security systems and managing interactions between the solar farm access tracks and NGs proposed haul road(s). All these matters need to be formally agreed and secured but progress is being made.

IR and NG had a meeting on 5th May to discuss the proposed amendments to NGs design, and the residual interfaces with IR's project. NG are currently reviewing the details further and the next meeting is expected to take place on 26th May. Following that next meeting it is considered likely that the parties will progress to discuss draft terms for an agreement.

12 May 2026

Ashfords LLP