

**PROJECT**

**THE NATIONAL GRID ELECTRICITY TRANSMISSION (LITTLE HORSTED  
SUBSTATION CONNECTION) COMPULSORY PURCHASE ORDER 2022**

**SUMMARY STATEMENT OF EVIDENCE**

**Ali Raza Khan  
Lead Connection Engineer  
National Grid Electricity Transmission Plc**

**1. QUALIFICATIONS AND EXPERIENCE**

- 1.1 My name is Ali Raza Khan, Lead Connection Engineer within National Grid. I have been with National Grid for 11 years and I am a member of the Institution of Mechanical Engineers and a Chartered Engineer since 2019.
- 1.2 I am responsible for leading the development and costing of, and managing feasibility studies for, connection offers to facilitate customer investments/projects.

**2. NATIONAL GRID**

- 2.1 NGET owns the high voltage electricity transmission system in England and Wales. One of NGET's obligations is to build and maintain the physical elements of the system safely, reliably, economically, and efficiently. Under NGET's transmission licence (**CD F1**), NGET is obliged to connect users wishing to connect to the system.
- 2.2 SEPN (part of the UKPN group) is one of NGET's customers. It owns and operates the low voltage (mainly 132kV & below) electricity distribution network in the London and South East region.

**3. THE LITTLE HORSTED SUBSTATION CONNECTION PROJECT**

- 3.1 The Project, comprises three principle elements; the construction of a new NGET 400kV Grid Supply Point (GSP) substation; a new 132kV SEPN substation, which will be built adjacent to NGET's 400kV GSP substation; and associated modification works to the existing 400kV Bolney to Ninfield 4VM overhead electricity line to enable the 400kV GSP substation to connect to it.
- 3.2 The 400kV NGET GSP will lower the voltage of the electricity flowing through the existing Bolney to Ninfield 4VM overhead electricity line from 400kV (transmission) to 132kV (distribution) which will allow the 132kV SEPN substation to connect to it.
- 3.3 The infrastructure is described in more detail in section 3 of the statement of evidence of Mr David Conway and in section 4 of the statement of evidence of Mr David Cole.

**4. THE NEED FOR AND BENEFITS OF THE PROJECT**

- 4.1 SEPN made a connection request to NGET on 18<sup>th</sup> November 2016 through the NGESO for the reinforcement of its 132kV network to maintain security of supply.
- 4.2 Under the Security and Quality of Supply Standards (SQSS), that triggered a requirement for a new GSP at Little Horsted, consisting of two Super Grid Transformers (SGT).
- 4.3 In accordance with NGET's licence obligation, NGET subsequently made a connection offer via the NGESO to SEPN, and the offer was accepted on 10<sup>th</sup> May 2018.

- 4.4 On 30<sup>th</sup> July 2019 SEPN submitted a modification application to the NGESO, requesting that the new substation should be designed such that two further 240MVA SGTs could be installed in the future to address the increased forecast demand in the local area.
- 4.5 NGET provided a revised offer to allow the future development of two additional SGTs, which will be required to satisfy this increased demand capacity under the SQSS criteria, at Little Horsted. The connection offer was accepted on 5<sup>th</sup> November 2019.
- 4.6 The Project is therefore required to fulfil that offer.
- 4.7 The key benefits that will arise from the Project are in-line with the National Policy Statement for Energy (NPS EN-1) (**CD A17**), and the NPS for Electricity Networks Infrastructure (NPS EN-5) (**CD A18**).
- 4.8 The Project will form an integral part of the UK's wider electricity network and provide energy reliably whilst ensuring security of supply because constructing additional substations increases the resilience of the network by enabling the power to flow where it is needed.
- 4.9 There is a compelling case in the public interest for the confirmation of the CPO.

**5. ALTERNATIVES TO THE SCHEME**

- 5.1 As explained in more detail in the statement of evidence of Mr David Conway, in order to identify a preferred site for the Project, NGET carried out a series of studies between 2018 and 2021, which followed the "Horlock Rules" (**CD F2**). The outcome of that process was that Plot 35 was selected as the preferred option.

**6. THE LAND AND RIGHTS NEEDED FOR THE PROJECT**

- 6.1 The Order Land comprises all the land required for the construction, operation, repair, maintenance and decommissioning of the Project.
- 6.2 As explained in the evidence of Mr James Ingram, NGET is taking a proportionate approach to acquisition and only seeks to acquire the freehold title to the Order Land for the purposes of above ground permanent infrastructure, namely the NGET GSP substation and the SEPN substation (Plot 35), and to mitigate the impacts of the new substations on the habitat of protected species (Plots 58a and 58b). In all other instances rights in land will be acquired rather than freehold acquisition. NGET has sought to minimise interference by preparing bespoke packages of rights affecting different plots to limit the powers being sought to those required to facilitate the delivery of the Project.

**7. ACQUISITION STRATEGY AND STATUS OF NEGOTIATIONS**

- 7.1 NGET is committed to reaching voluntary agreement in respect of all land interests required for the Project, if possible, in accordance with the Department for Housing, Communities and Local Government's *Guidance on Compulsory Purchase process and The Criche! Down Rules* (July 2019) ("CPO Guidance") (**CD A20**).

- 7.2 NGET has attempted to engage constructively in meaningful discussions with all known owners and occupiers of the Order Land.
- 7.3 Notwithstanding the substantial and ongoing efforts made to acquire interests in the land by way of voluntary agreement, at the date of making the Order, NGET has been unable to secure all those interests by negotiation. It was therefore necessary for NGET to seek a range of compulsory powers, to enable delivery of the Project.

**8. PROJECT DELIVERY AND FUNDING**

- 8.1 NGET is part of the National Grid group of companies. NGET, through its parent company National Grid, has an excellent track record in delivering infrastructure projects, including new substations, and has an excellent financial standing.
- 8.2 The programme for the Project has been driven by SEPN's requirement of meeting their power demand requirements by Q4 of 2024 and the power system access availability window (power outage window) of early Q2 of 2024, which allows the 400kV NGET GSP substation to connect to the NETS.

**Planning Permission**

- 8.3 As explained in the evidence of Mr David Conway, NGET can make use of its permitted development rights as a statutory undertaker, and exemptions under Section 37 of the Electricity Act 1989 ("the 1989 Act").
- 8.4 For the substation site, a planning application was submitted to Wealden District Council (WDC) on 19th March 2021 under reference WD/2021/0733/MAJ, and planning permission was granted on 12th November 2021 (**CD C5**).

**Funding**

- 8.5 NGET is responsible for designing, constructing, and financing the NGET 400kV GSP substation and modification to the existing 400kV Bolney to Ninfield overhead electricity line.
- 8.6 NGET is also responsible for the payment of compensation for the acquisition of land and rights required for the Project whether through voluntary agreements or the Compensation Code.
- 8.7 Financing for the Project, including the acquisition of land and new rights and the implementation of the scheme, will be managed from within the National Grid's own resources, credit facilities, and routine debt financing.
- 8.8 National Grid Plc has a strong credit rating, and the requisite funding is available to meet the construction and remaining land acquisition/compulsory purchase compensation costs associated with the Project as and when required (including any advance payments).

**9. POWER UNDER WHICH THE ORDER IS MADE AND DECISION TO MAKE THE ORDER**

- 9.1 The Order (**CD D1**) was made pursuant to section 10 of, and schedule 3 to, the Electricity Act 1989 ("the Act") (**CD A5**) , and having regard to the CPO Guidance (**CD A20**).
- 9.2 NGET holds an transmission licence ("Licence") (**CD F1**) granted under section 6(1)(b) of the 1989 Act. As such, it is empowered to promote a CPO to obtain powers to compulsorily acquire the land and rights required to enable NGET to carry on the activities authorised by its Licence to construct the Project.

10. **RESPONSE TO OBJECTIONS**

- 10.1 As explained in section 8 of the evidence of Mr James Ingram, at the time of writing, four objections to the CPO remain where NGET continues to negotiate with the remaining objectors.

11. **HUMAN RIGHTS AND THE EQUALITY ACT CONSIDERATIONS**

- 11.1 Careful consideration has been given by NGET to the interference with the individual rights of those directly affected by the Order that are protected by the Human Rights Act 1998 (**CD A6.1**).
- 11.2 NGET has sought to keep any interference with the rights of those with interests in the Order Land to a minimum. The land within the Order has been limited to the minimum required for the Project to be installed, operated, and maintained.
- 11.3 In promoting the CPO, NGET has had regard to the public sector equality duty in section 149 of the Equality Act 2010 (**CD A11.1**).
- 11.4 NGET has undertaken consultation and landowner engagement as part of its promotion of the Order. NGET has taken account of the location of its proposed sites and considered receptors and effects on those receptors through its environmental appraisals and though engagement with affected persons. I do not consider that the Project will adversely affect any of the equality objectives set out in the Act.

12. **CONCLUSIONS**

- 12.1 For the reasons set out in my statement I consider that NGET has complied with the CPO Guidance (**CD A20**) and that there is a compelling case for making the Order (**CD D1**).

13. **DECLARATION**

I believe that the facts stated in this proof of evidence are true.



Ali Raza Khan

18 November 2022