

AMARDEEP MALHI: THE SCHEME

PROOF OF EVIDENCE

1 SUMMARY AND CONCLUSIONS

- 1.1 My name is Amardeep Malhi. I am a Lead EPC Project Manager for NGET. My role is to develop the Project and administer the NEC4 contract acting as the delegated Project Manager on behalf of NGET.
- 1.2 NGET is responsible for the high voltage electricity transmission network in England and Wales and is regulated by Ofgem. As part of RIIO-T1 (2013-2021), Ofgem set aside £500 million for transmission owners to address the visual impact of existing transmission infrastructure in designated areas. Ofgem made a further provision of £465 million available for RIIO-T2 (2021-2026). NGET is required by its licence to deliver these schemes.
- 1.3 NGET's approach is governed by its VIP Policy (**CD D6**). The LVIP Technical Report identified subsection ZF.2 as a red category subsection indicating high importance (**CD D1**). The undergrounding of the entirety of ZF.2 was considered unfeasible for technical and cost reasons. An independent report was commissioned which concluded that ZF.2(B) would result in the most significant visual benefits.
- 1.4 In June 2020, the Stakeholder Advisory Group recommended the Project as a priority undergrounding project. NGET undertook further engagement from 2021. In March 2022, NGET committed to proceed with the Project.
- 1.5 The Project comprises the undergrounding of approximately 7 kilometres of existing OHL subsection ZF.2(B) within the Cotswolds National Landscape. Key components include installation of approximately 7 kilometres of 400kV underground cables, dismantling and permanent removal of 7 kilometres of existing OHL including net removal of 16 pylons, construction of two new CSECs with new terminal pylons, a permanent cable easement with approximate width of 40 metres, and expansion of Melksham Substation for a new shunt reactor. A temporary (one year) OHL diversion will be required at the southern CSEC.
- 1.6 It is NGET's statutory duty under Section 9 of the 1989 Act to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. NGET must also have regard to preserving natural beauty and conserving flora and fauna. Section 85 of the CRoW Act 2000 requires NGET to further the purpose of conserving and enhancing natural beauty of an AONB.
- 1.7 The Project will lead to removal of approximately 7 kilometres of OHL and net removal of 16 pylons which will significantly benefit the landscape and visual qualities of the Cotswolds National Landscape. Additionally, the Project offers the benefit of upgrading the circuit. This comprises a very significant benefit, driven by a brand new asset providing improved ratings over existing OHL conductor and installation of two new shunt reactors providing improved voltage management.
- 1.8 NGET undertook a comprehensive options appraisal process. For the northern CSEC, NGET assessed four location options (N1-N4). Option N4 was selected due to good screening, manageable technical challenges, and good access arrangements. For the southern CSEC, NGET assessed six options (S1-S6). Option S2 was selected as the preferred location. NGET gave particular consideration to whether the southern CSEC could be located south of the A40 (Options S5 and S6). Although these would have resulted in removal of an additional 3 pylons, they were not selected due to significant technical challenges including topographical challenges requiring cables to ascend approximately 60-80 metres up the escarpment, complex crossings beneath the A40, railway

embankments and River Chelt, and construction constraints severely restricting access and working space.

- 1.9 NGET assessed 9 configurations for the northern CSEC and 6 for the southern CSEC. North End C was chosen as preferred northern configuration. South End F within S2 was chosen for the southern CSEC. NGET also evaluated South End E within S4, which positioned the CSEC slightly further from the Cotswolds National Trail, but was not selected due to significant drawbacks including requiring construction across two separate land parcels and introducing additional technical complexity.
- 1.10 NGET assessed various cable route options divided into three sections. The preferred route comprises Route A for Sections 1 and 2, and a combination of Route C and Route B for Section 3. NGET assessed six options for the shunt reactor across three substations. Melksham was selected as the preferred choice. This options appraisal process demonstrates the selected scheme represents the optimal solution.
- 1.11 The Order Land comprises all land required for delivery of the Project. NGET is taking a proportionate approach to acquisition and only seeks to acquire freehold title where land is needed for permanent infrastructure. NGET has been in negotiation for acquisition of necessary land and rights. Whilst significant progress has been made, NGET has not yet secured all land and rights required. It was therefore necessary to start the CPO process in parallel with private treaty negotiations.
- 1.12 NGET has an excellent track record in delivering infrastructure projects. NGET has delivered the Dorset VIP project which facilitated removal of 22 pylons. NGET has a preferred bidder as main contractor and expects contract award by April 2026. Main construction works will commence in June 2026. NGET's intention is for the underground connection to be operational and existing pylons and overhead lines to be removed in 2029. The linear nature means construction activities will be focused in concentrated areas as the project progresses.
- 1.13 The RIIO-T2 framework covers 1 April 2021 to 31 March 2026. NGET submitted its funding application to Ofgem on 16 May 2025. VIP schemes must be approved by Ofgem and written into NGET's transmission licence by 31 March 2026. There is no intention to include VIP projects within RIIO-T3. Once written into the licence, VIP schemes become a licence condition. Funding would be available by the time the Order enabled exercise of compulsory acquisition powers. NGET has carried out an assessment of expected compensation and is confident costs can be fully met. Given NGET's strong credit rating, requisite funding is available.
- 1.14 The Order was made pursuant to section 10 of, and schedule 3 to, the 1989 Act. NGET holds an Electricity Transmission Licence and is empowered to exercise powers of compulsory acquisition. NGET is taking a proportionate approach, seeking a combination of freehold title (for the two CSECs) and permanent rights. As at the date of making the Order, NGET has been unable to secure all requisite interests through negotiation. It is therefore necessary to seek compulsory powers. Negotiations will continue in parallel with the CPO process.
- 1.15 NGET is only seeking acquisition of freehold title where necessary. There are no residential interests affected. The Order is being promoted in the public interest and will strike the right balance between public interest and private rights. The Order has been extensively publicised. All affected parties have been notified and have the right to make representations and objections. Those whose interests are acquired will be entitled to compensation. NGET has sought to keep interference to a minimum. There is a compelling case in the public interest, and any interference would be lawful, justified and proportionate.
- 1.16 The public sector equality duty does not apply to NGET in making the Order, but NGET has had regard to that duty. NGET has taken account of receptors and effects through its environmental

assessment processes. NGET does not currently consider the Project will give rise to impacts on persons who share a relevant protected characteristic.

- 1.17 7 objections to the Order were initially made, but 3 have been withdrawn. 4 objections remain. None suggest any impediment to delivery of the Project. Mr Jonathan Morton Stanley and Corinium Construction Limited object that NGET does not fully justify its reasoning for selecting one option over another. My statement details the assessment that resulted in identification of ZF.2(B) and the robust criteria and independent process. Options S5 and S6 south of the A40 presented landscape benefits but were not selected due to fundamental technical challenges. South End F (within S2) provided optimal performance across assessment criteria.
- 1.18 This objection also states the Order will disrupt farming, holiday lets and business operations. Any losses will be compensated appropriately. The objection also states NGET does not establish a compelling case and has failed to consider Article 8 rights. NGET has given full consideration to Article 8. The Order has been made pursuant to statutory powers, ensuring any interference is lawful. NGET has adopted a proportionate approach by seeking only minimum land and rights necessary. There is a compelling case in the public interest. Any interference with Article 8 rights is justified and proportionate, particularly given compensation will be available.
- 1.19 RH Barnes and Sons suggest alternative routes for the haul road. Relocating the main construction compound would not eliminate the necessity for the haul road. The suggested alternatives have been investigated and assessed. The blue route presents challenging topography introducing unacceptable health and safety risks. The yellow route was discounted as it would be very close to adjacent receptors. The selected route represented the most appropriate option. RH Barnes and Sons also raise concerns about impacts on commercial businesses during construction. Losses will be temporary and limited in scope and will be compensated appropriately. Extensive mitigation measures are set out in the OCEMP to minimise disruption.

2 WITNESS DECLARATION

- 2.1 I confirm that the evidence prepared for this Inquiry and contained within this statement of evidence are my true and professional opinions. I confirm that I have understood and complied with my duty to the Inquiry as an Expert Witness and have provided my evidence impartially and objectively. I confirm that I have no conflicts of interest.
- 2.2 I confirm that artificial intelligence has not been used to produce this statement of evidence.



AMARDEEP MALHI

13th October 2025