

OUR REF S6152.28/CBW/CWI
YOUR REF
26 February 2026

National Infrastructure Planning
Temple Quay House
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Dear Examining Authority

Norwich to Tilbury Project (the “Project”)
Application Ref: EN020027

Deadline 1 Submission for ScottishPower Renewables (UK) Limited and East Anglia THREE Limited

1. Introduction

- 1.1 We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited (“**SPR**”) and East Anglia THREE Limited (“**EA3L**”).
- 1.2 EA3L is developing the East Anglia THREE Offshore Windfarm (“**EA3**”), an offshore wind farm located approximately 69km from the Suffolk coast and an onshore cable route to transport energy to a converter station in Bramford, as authorised by East Anglia THREE Offshore Wind Farm Order 2017. SPR is the parent company of EA3L. Both parties are identified in the book of reference [AS-018] submitted by National Grid Electricity Transmission (the “**Applicant**”) as having interests in land required for the Project.
- 1.3 Construction works for EA3 are underway. The project will deliver up to 1,400MW of generation capacity. Works are being undertaken along a 37km onshore cable corridor between the Suffolk coast at Bawdsey and the converter station at Bramford, passing the northern side of Ipswich. Onshore construction works are currently anticipated to be completed in 2026/2027.
- 1.4 SPR and EA3L note that in the near future, certain transmission assets forming part of EA3 (both onshore and offshore) will be required to be transferred to an Offshore Transmission Owner.

2. Interaction between the Project and EA3

Land interests

- 2.1 As noted above, the Applicant is currently seeking rights of compulsory acquisition and temporary possession over plots which SPR and EA3L own or otherwise have an interest in. The current draft Order Limits for the Project, shown on the Locations and Master Key Plan [APP-008], Land Plans (Sheet B-20) [APP-010] and Works Plans (Sheet B-20) [APP-018] show that elements of the overhead line works extend into the Order Limits for EA3.
- 2.2 As a result, SPR and EA3L are concerned regarding the interaction between the Project and EA3. SPR and EA3L consider the overlap between the Order Limits for the respective projects raises issues regarding land use conflict. In particular, the proposal for compulsory acquisition and temporary possession powers to apply to land required for EA3 is not acceptable as it introduces considerable uncertainty as to SPR and EA3L’s ability to use that land.

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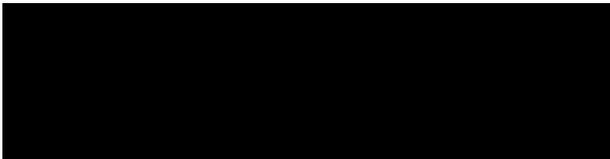
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- 2.3 Following the completion of construction of EA3, the land with the EA3 Order limits will be operational land. It is essential that the construction, maintenance and access to EA3L's assets is not disrupted by the Project.
- 2.4 EA3L and SPR consider that it is possible for the Project to avoid encroaching on the areas which are within the EA3 Order limits. As such, they consider that any areas which are required for EA3 should be excluded from the Order limits for the Project.
- 2.5 However, if this is not possible, any plots in which EA3L or SPR have an interest must not be subject to powers of compulsory acquisition or temporary possession. These plots should be reclassified as 'Class 8' within the book of reference [AS-018]. The draft Development Consent Order [APP-056] will need to be amended to clarify that any powers of temporary possession do not apply to class 8 land. Any access to or use of such land for the Project will need to be negotiated privately.
- 2.6 If land in which SPR and EA3L have interests is unable to be excluded from the Order limits, SPR and EA3L will require bespoke protective provisions to be included in any Development Consent Order granted for the Project, to ensure their current and future interests are protected.

Environmental matters

- 2.7 SPR and EA3L also have concerns regarding the impact of the Project on environmental mitigation provided for EA3.
- 2.8 First, SPR and EA3L consider the Project could impact EA3's sustainable drainage system ("**SuDS**") basin. The Applicant must prepare measures which will ensure that EA3L's access to this infrastructure is maintained at all times. Further, the Applicant must demonstrate how it will manage any issues relating to run-off from construction activities for the Project. In particular, the Applicant must comply with any requirements applying to protected species present in the SuDS.
- 2.9 Finally, SPR and EA3L note that any works undertaken as part of the Project must not undermine the landscape mitigation to be provided for EA3 in accordance with its landscape management plan and the relevant requirements of the East Anglia THREE Offshore Wind Farm Order 2017. The mitigation being provided for EA3 has been carefully designed and developed to mitigate views of the substations, and this mitigation must not be compromised.

Yours faithfully



For and on behalf of Shepherd and Wedderburn LLP