



Planning Inspectorate  
c/o QUADIENT  
69 Buckingham Avenue  
Slough  
SL1 4PN

12 March 2026  
Interested Party Reference: [REDACTED]  
VE Ref: 006662117-01

Dear Sir / Madam,

**National Grid Norwich to Tilbury Project (EN020027) - Five Estuaries Offshore Wind Farm  
Deadline 2 Submission**

This letter provides Five Estuaries Offshore Wind Farm Ltd's (Five Estuaries) Deadline 2 submission for the Norwich to Tilbury Project (the Project) examination.

Five Estuaries would like to update the Examining Authority that development consent for Five Estuaries Offshore Wind Farm was granted by the Secretary of State on 17 December 2025. The Five Estuaries Offshore Wind Farm Order 2025 came into force on 08 January 2026. The proposed East Anglia Connection Node Substation (Work No. 8 of the Project) will be the point of operational interface for the connection between Five Estuaries and the Project, connecting up to 1080MW of clean, renewable energy to the grid.

The Five Estuaries Offshore Wind Farm Order 2025 includes protective provisions in favour of NGET. The protective provisions in favour of Five Estuaries that are currently included within the Applicant's draft Order [APP-056] are agreed with Five Estuaries. The two sets of provisions together ensure that both DCOs can co-exist and are deliverable, and that use of compulsory powers is adequately controlled, particularly where these overlap.

Five Estuaries has been reviewing selected submissions by Interested Parties made into the Norwich to Tilbury Project examination and has the following responses to the representations made in relation to Five Estuaries:

**1. Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh [AS-064]**

Five Estuaries provides the following comments/responses to the points made in the "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh" [AS-064] submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council. Five Estuaries notes that in section 8 it is suggested that Five Estuaries could be connected to the National Grid using HVDC technology.

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number 12292474

# FIVE ESTUARIES

## OFFSHORE WIND FARM

*“8.15 The use of HVDC technology to bring the power ashore from the North Falls and Five Estuaries windfarms would also provide much greater flexibility in where the grid connections could take place and hence the substations located.*

*8.16 As the losses from HVDC export cables are significantly lower than they are for the HVAC versions currently proposed the North Falls and Five Estuaries windfarms this overcomes location restrictions due to cable length limitations.”*

As noted, Five Estuaries already has a granted DCO for its project based on its technology design and substation location. The principle and location of that substation has therefore been determined to be acceptable by the Secretary of State.

Whilst HVDC losses are lower at greater cable lengths, HVAC circuit lengths typically around 150 km are economic and feasible, and in some circumstances can be used for distances up to around 190 km. The longest export cable proposed to be used for the Five Estuaries offshore wind farm is 90 km and fits well inside the HVAC design envelope.

In the UK the export systems of wind farms are regulated by Ofgem and a developer must demonstrate these are "economic and efficient". HVDC electrical equipment used in converter stations is currently being offered by suppliers in fixed unit sizes of typically 1300 – 1400 MW and 2000-2100 MW (larger than the maximum 1080 MW for the Five Estuaries offshore wind farm). For the Five Estuaries site at maximum 1080 MW and up to 90 km from shore, an oversized HVDC system would not pass this regulatory requirement as an appropriately sized HVAC system is more economic and efficient. Five Estuaries has been consented and developed on the basis of using HVAC technology.

*“8.19 Instead of requiring a total of 12 separate HVAC onshore power cables for the North Falls and Five Estuaries windfarms only 2 HVDC cables would be required thereby hugely reducing the swathe through the countryside and the overall harm caused. This is demonstrated in the images provided in Appendix H-1.”*

This argument is not relevant to the Norwich to Tilbury Project examination as the impacts of the Five Estuaries cables have been considered and determined to be acceptable through the Five Estuaries DCO process. In any case, in either HVAC or HVDC scenario, once the onshore electrical cables are installed, the land over the top is reinstated and returned to its previous use meaning land use can resume post construction minimising harm. Using HVDC technology would require the construction of a converter station which would be significantly larger than the equivalent HVAC substation. This converter station would be present for the lifetime of the project. The Five Estuaries consent does not include a converter station nor the larger land take that would be required for such a station.

## **2. Tendring District Council Local Impact Report (LIR) [REP1-182]**

Five Estuaries notes that there are several requests in Tendring District Council's (TDC) LIR [REP1-182] which request that 'binding' restrictions or 'compulsory' obligations are placed on Five Estuaries within the Norwich to Tilbury DCO. These include:

*7.18 request 3 ‘Cumulative delivery plan across NSIPs’ “TDC is asking for a binding multi-promoter Construction and Environmental Management Plan framework covering shared corridors, single-pass soil handling, and synchronised works, to avoid double-digging and repeated disruption. (ECC has referred to the lack of pre-application resolution—TDC seeks enforceable, examination-stage remedies”*

*10.28 request 2 “Legally binding coordination mechanisms across N2T, NF, FE, and TI, including aligned construction timetables and shared mitigation strategies.”*

### *12.10 Legally Binding Inter-Project Coordination Framework*

*“A compulsory, multi-promoter (as a minimum to include NF, NF and N2T) coordination mechanism must be secured, including:*

- Shared construction timetables*
- Joint planning of peak-impact phases*
- Formal reporting to ECC Highways & TDC or any subsequent newly formed combined authority*
- A requirement for quarterly joint coordination boards chaired by ECC or TDC “*

We note that TDC has not stated how it considers that the ‘legally binding’ obligations could be secured. Five Estuaries objects to any such imposition of restrictions or obligations on its development as being outside the scope of what the Norwich to Tilbury DCO can lawfully include.

Five Estuaries submits that there is no legal basis for the imposition requested by TDC to be included in the order. Section 120 of the Planning Act 2008 sets out what may be included in an order granting development consent. That includes allowing requirements to be imposed “in connection with the development for which consent is granted” (s120(1)), provisions relating to “the development for which consent is granted” (s120(3)). Five Estuaries does not form part of the development for which the Norwich to Tilbury DCO would grant consent. Under s120 such requirements on or provisions relating to Five Estuaries therefore cannot be included in the Norwich to Tilbury DCO.

In order to be valid, all requirements imposed in a DCO must comply with the tests for planning conditions, including that they must be directly related to the development for which consent is sought. Planning obligations must also be directly related to the development to which they relate (to comply with regulation 122 of the Community Infrastructure Levy regulations). TDC have requested these obligations to control not just the Norwich to Tilbury DCO project, but the Five Estuaries development. That Five Estuaries development is outside the scope of the application before the Examining Authority and does not form part of the development for which consent is sought in this process. Five Estuaries already has its own consent subject to its own controls which the Secretary of State has determined to be sufficient to make that development, including its assessed cumulative impacts, acceptable in planning terms. Any requirement or obligation seeking to control Five Estuaries would fail the ‘directly related’ test and cannot be lawfully imposed. It is also submitted that no requirement on Five Estuaries could meet the necessity test given that the Five Estuaries DCO already contains all the requirements determined by the Secretary of State to be necessary for that development.



## OFFSHORE WIND FARM

Five Estuaries is committed to coordinating with NGET and North Falls as set out in the Tripartite Position Statement, Appendix B of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134].

Five Estuaries submits that it is outside the lawful ability of the Norwich to Tilbury DCO for that order to impose controls, restrictions or obligations on how Five Estuaries carries out its consented development. Five Estuaries accordingly considers that all of the requests made by TDC should be rejected.

### 3. Other submissions

Five Estuaries would like to note that given the volume of submissions into the examination by Interested Parties it has not sought to highlight all inconsistencies, but would welcome any questions, clarifications or queries which the Examining Authority may have in relation to the Five Estuaries project or the interdependencies with the Norwich to Tilbury Project, including the ongoing coordination activities.

Yours faithfully,



Diane Mailer  
**Project Lead**  
**Five Estuaries Offshore Wind Farm**