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## TC East Anglia One OFTO Limited - Norwich to Tilbury NSIP Project - Representation for the CA hearing

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From [REDACTED] >

Date Mon 2026-04-27 09:29

To Norwich to Tilbury <NorwichtoTilbury@planninginspectorate.gov.uk>

Cc [REDACTED]

[REDACTED]

Dear Sir/Madam,

TC East Anglia One OFTO Limited (“the OFTO”) owns and operates the offshore transmission system associated with the East Anglia One Offshore Windfarm. This includes the offshore substation, offshore and onshore export cables, the onshore substation, and associated infrastructure connecting to National Grid Electricity Transmission Plc’s (“NGET”) Bramford Substation. TC East Anglia One OFTO Limited holds a transmission licence under section 6C(5) of the Electricity Act 1989 and is therefore a statutory undertaker for the purposes of the Planning Act 2008.

The OFTO first became aware of the Norwich to Tilbury project on 2nd February 2026, following contact by one of the Applicant’s consultants. Prior to that date, the OFTO had not been consulted in respect of the project and had not been identified within the Book of Reference, despite owning and holding registered property interests in the East Anglia One transmission assets since 2023. This absence of engagement is of particular concern given the operationally critical and safety sensitive nature of the OFTO’s infrastructure.

Following notification, the OFTO attended meetings with NGET on 11th February and 25th February 2026 to discuss the interface between the project and the OFTO’s assets and to raise its concerns. Notwithstanding these discussions, and repeated subsequent attempts by the OFTO to progress matters, there has been no substantive or meaningful engagement by the Applicant, nor has adequate detail been provided to enable the OFTO to understand or assess the impacts of the authorised development. The position set out in the OFTO’s representation submitted on 11th February 2026 therefore remains unchanged.

The draft Development Consent Order seeks powers to enter, occupy and compulsorily acquire land and rights affecting the OFTO’s operational electricity transmission assets. The Applicant’s own documentation indicates that the project anticipates approximately 94 interface or crossing points affecting the OFTO’s infrastructure, including in relation to substation haul roads, overhead line haul roads, and substation extension works. Of particular concern is the inclusion of Plot 20/199, comprising the OFTO’s operational substation, within the Order limits. The OFTO considers this entirely unacceptable in its current form. No justification has been provided for the inclusion of compulsory acquisition powers affecting the OFTO’s land or rights.

As a licensed electricity transmission operator, the OFTO must ensure the safe, secure and uninterrupted operation of its transmission system at all times. Any works proposed in proximity to, or affecting, those assets present significant operational, safety and regulatory risks. The OFTO notes that other statutory undertakers affected by the Norwich to Tilbury project have raised similar concerns regarding engagement, interfaces with operational infrastructure and the need for appropriate legal protection, and that many of those issues are being progressed through bespoke protective provisions and side agreements.

The OFTO therefore considers it essential that the Development Consent Order includes bespoke protective provisions, specifically tailored to assets owned and operated by an offshore transmission owner. Reliance on generic protective provisions would be insufficient given the scale, criticality and regulatory context of the OFTO’s infrastructure. Any such provisions must, as a minimum:

- prevent the compulsory acquisition of the OFTO's statutory undertaker land or rights, save with the OFTO's express written consent;
- prohibit any works that may interfere with, compromise or prejudicially affect the operation, maintenance, repair, replacement or upgrading of the OFTO's transmission system;
- require the OFTO's prior written approval of construction methodologies, access arrangements and protective measures for all crossings and interfaces;
- secure full indemnities in respect of damage, disruption, loss and regulatory consequences arising from the authorised development; and
- preserve the OFTO's statutory rights and obligations under the Electricity Act 1989 and the terms of its transmission licence.

In addition, the OFTO considers that the inclusion of its land and assets within the Order engages section 127 of the Planning Act 2008. In the absence of agreement, the statutory test in section 127 cannot be satisfied, as the proposed compulsory acquisition and use of the land would give rise to serious detriment to the carrying on of the OFTO's statutory undertaking.

Accordingly, TC East Anglia One OFTO Limited maintains its objection to the development as currently drafted. This objection is without prejudice to the OFTO's willingness to engage constructively with the Applicant to agree appropriate interface arrangements, crossing agreements and bespoke protective provisions.

Kind regards,

██████████  
Senior Commercial Operations Manager

### **Transmission Investment**

17th Floor, 88 Wood Street, London, EC2V 7DA  
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**From:** ██████████

**Sent:** 11 February 2026 10:48

**To:** NorwichToTilbury@planninginspectorate.gov.uk

**Cc:** ██████████

**Subject:** TC East Anglia One OFTO Limited - Norwich to Tilbury NSIP Project

Dear Sir/Madam,

TC East Anglia One OFTO Limited owns and operates the offshore transmission system associated with the East Anglia One Offshore Windfarm. This includes the offshore substation, on and offshore cables, the onshore substation, and connecting infrastructure to NGET's Bramford Substation. TC East Anglia One OFTO Limited holds a Transmission Licence under section 6C(5) of the Electricity Act 1989 and as such is a statutory undertaker.

On the 2nd February 2026, TC East Anglia One OFTO Limited was made aware of this project via one of the project's consultants and has not previously been consulted on in relation to this project or identified in the Book of Reference, despite owning and having registered property interests in the transmission system for the East Anglia One Offshore Windfarm since 2023. We understand, through recent high-level communications, that National Grid will require various agreements with TC East Anglia One OFTO Limited in relation to the Norwich to Tilbury NSIP project, in order to agree measures to protect TC East Anglia One OFTO's apparatus. The proposed works areas are in close proximity to TC East Anglia One OFTO's assets, with the Applicant expecting approximately 94 known crossings consisting of the project's substation haul road, OHL haul road and substation extension. This affects various elements of TC East Anglia One OFTO's transmission system, including its operational substation which appears to have been included within the project's order limits, which is unacceptable to TC East Anglia One OFTO Limited in its current form.

We currently have no agreements in place with Norwich to Tilbury, nor have we had any meaningful discussions. In principle, we have no objections to the Norwich to Tilbury Development; however, it is imperative that our assets and operational activities are protected from any detrimental impacts of the

development. As such we would like to register our objection to the development, pending the satisfactory outcome of the negotiations with Norwich to Tilbury in respect of any land, interface or crossing agreements and we would expect protective provisions to be provided in any order for the benefit of TC East Anglia One OFTO Limited.

We look forward to engaging constructively with you to agree on the necessary protective provisions and commercial arrangements.

Kind regards,



Senior Commercial Operations Manager

**Transmission Investment**

17th Floor · 88 Wood Street · London · EC2V 7DA



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