



Pinsent Masons

BY E-MAIL

Susan Hunt
Lead Panel Member
Examining Authority for the Norwich to Tilbury DCO Application

6 May 2026

Dear Ms Hunt

**Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project (EN020027)
Request by Hornsea Project Three (UK) Limited to be added as an Interested Party in respect of its Category 2 interest in land within the Norwich to Tilbury Order Limits pursuant to s102A of the Planning Act 2008**

- 1.1 This written representation is made by Pinsent Masons LLP on behalf of Hornsea Project Three (UK) Limited (“Hornsea Three”), the named undertaker¹ in the Hornsea Three Offshore Wind Farm Order 2020 (as amended) (the “Hornsea Three Order”). Hornsea Three is also the holder of a generation licence pursuant to the Electricity Act 1989 and is therefore a statutory undertaker for the purposes of the Planning Act 2008.
- 1.2 The point of connection for the Hornsea Three Offshore Wind Farm is the Norwich substation.
- 1.3 Hornsea Three commenced the authorised development (as defined in the Hornsea Three Order) in 2023 and has completed the installation of the onshore grid connection cables, including the section that will connect into the Norwich substation. The testing and commissioning of these cables will be completed once the necessary works at Norwich substation have been completed.
- 1.4 Hornsea Three has an interest in the following plots listed in the Book of Reference [AS-018] pursuant to an option agreement with the landowner and/or as a result of a local land charge that was registered pursuant to s134(6A) of the Planning Act 2008 in respect of the Hornsea Three Order. Please note that Hornsea Three has requested the GIS shapefiles from the Applicant in order to confirm the exact extent of the overlap:

¹ The undertaker was previously called Orsted Hornsea Project Three (UK) Limited and changed its name on 16 March 2026.

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Plot Number:	Comments on Book of Reference:
A-1/1	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/2	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/3	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).
A-1/4	The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables). In addition to the presence of its cables, Hornsea Three also has an interest in this plot as a result of the local land charge pursuant to the Hornsea Three Order.
A-1/5	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/6	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/8	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/53	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/56	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).
A-1/57	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/58	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).

1.5 As the above plots are also located within the Order limits for the Hornsea Three Order, Hornsea Three has extant compulsory acquisition powers over these plots pursuant to the Hornsea Three Order.

1.6 Discussions are ongoing between Hornsea Three and National Grid Electricity Transmission plc (the "Applicant") in relation to the interactions between the two projects.



- 1.7 Hornsea Three has entered into an Option Agreement with the Applicant (dated 29 March 2019) for the necessary rights for Hornsea Three's cables in land owned by the Applicant. The technical specification for, and routing of, Hornsea Three's cables was agreed with the Applicant prior to installation.
- 1.8 However, Hornsea Three notes that the draft DCO [REP3-004] seeks the power to acquire land, acquire new rights over land, impose restrictions and to extinguish or suspend rights belonging to statutory undertakers subject to Schedule 16 of the draft DCO. This includes both the land where Hornsea Three has an Option Agreement with the Applicant and adjacent land where Hornsea Three has entered into option agreements with third party landowners.
- 1.9 Whilst Part 1 of Schedule 16 to the draft DCO includes provisions preventing the acquisition of statutory undertaker apparatus without agreement, it does not restrict the extinguishment or suspension of property rights that are held for the benefit of Hornsea Three. Similarly it does not contain provisions to deal with overlapping compulsory acquisition powers.
- 1.10 In light of above, Hornsea Three requires bespoke protective provisions and/or a side agreement to be put in place to enable the two projects to co-exist and to ensure that there is no impediment to the commissioning and operation of the Hornsea Three Offshore Wind Farm and no serious detriment is caused to Hornsea Three's undertaking.
- 1.11 Hornsea Three and the Applicant are already in discussions on this point and Hornsea Three is confident that agreement can be reached prior to the end of the Examination. In the unlikely event that agreement is not reached, Hornsea Three will submit its preferred drafting for protective provisions to be included in the DCO towards the end of the Examination.
- 1.12 Hornsea Three requests that this letter is accepted by the Examining Authority as an application pursuant to section 102A of the Planning Act 2008 for it to be added as an interested party pursuant to its Category 2 interest in the above listed plots under s102 of the Planning Act 2008.
- 1.13 Hornsea Three also requests that the Applicant corrects the nature of its interests (as per the table above) in the next iteration of the Book of Reference.

Yours sincerely

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Partner
for Pinsent Masons LLP

This letter is sent electronically and so is unsigned