

OUR REF S6530.18/CBW/CWI

7 July 2026

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Examining Authority

Norwich to Tilbury Project (the “Project”)

Application Ref: EN020027

**ScottishPower Renewables (UK) Limited, East Anglia THREE Limited and East Anglia ONE Limited’s
Deadline 6 Submission**

1. Introduction

- 1.1 We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited (“**SPR**”), East Anglia THREE Limited (“**EA3L**”) and East Anglia ONE Limited (“**EA1L**”) (together, the “**SPR Parties**”).
- 1.2 SPR is one of the parent companies of EA3L and EA1L, who have the benefit of the East Anglia THREE Offshore Wind Farm Order 2017 (“**EA3**”) and the East Anglia ONE Offshore Wind Farm Order 2014 (“**EA1**”) respectively.
- 1.3 This submission provides a written summary of oral case for Compulsory Acquisition Hearing 3 (“**CAH3**”) and comments on National Grid Electricity Transmission’s (the “**Applicant**”) Deadline 5 submissions.

2. Written Summary of Oral Case – CAH3

- 2.1 CAH3 for the Project took place in person and virtually on 24 June 2026. [REDACTED], Partner at the law firm Shepherd and Wedderburn LLP, gave oral submissions on behalf of the SPR Parties under Agenda Item 4.
- 2.2 Since the SPR Parties’ Deadline 5 submission [REP5-267], the SPR Parties, the Applicant and their respective legal teams held an extensive meeting which was very productive. The key issues were discussed and it is agreed that there are three next steps:
- 2.2.1 The Applicant is to amend the draft Development Consent Order (“**DCO**”) to correct matters raised in our Deadline 5 submission [REP5-267] and is to reclassify plot B-20/199 as Class 8 land in the Book of Reference [REP5-072] and Land Plans [REP5-008];
- 2.2.2 The SPR Parties and the Applicant will continue to work together in relation to an interface agreement to try and manage interfaces between the projects, specifically:
- (i) Bullen Lane – This is a critical means of access for EA3 and EA1 who rely entirely on Bullen Lane for access. The Project’s draft DCO [REP5-060] promotes extensive compulsory acquisition of land and rights, as well as the ability to widen Bullen Lane, parts of which are public highway. The SPR Parties

1-6 Lombard Street
London
EC3V 9AA
DX 98945 Cheapside 2
T +44 (0)20 7429 4900
F +44 (0)20 7329 5939

9 Haymarket Square
Edinburgh
EH3 8FY
DX 551970 Edinburgh 53
T +44 (0)131 228 9900
F +44 (0)131 228 1222

1 West Regent Street
Glasgow
G2 1RW
DX GW409 Glasgow
T +44 (0)141 566 9900
F +44 (0)141 565 1222

37 Albyn Place
Aberdeen
AB10 1YN
DX AB103 Aberdeen 1
T +44 (0)1224 621 166
F +44 (0)1224 623 103

S6530.18 1023398363 6 CBW

are content with this in principle, as long as they are afforded adequate protection to ensure access is maintained. We note that the Applicant confirmed in CAH3 that access will be maintained over Bullen Lane at all times during construction and operation and that this will be secured in the interface agreement; and

- (ii) EA3 is currently still under construction and has a greater interface with the Project than EA1;

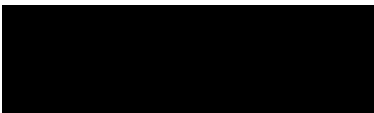
2.2.3 The SPR Parties have prepared bespoke protective provisions for EA3L, EA1L and SPR to ensure that if the interface agreement is not concluded before the close of the Examination, the SPR Parties are afforded some protection. These draft bespoke protective provisions have been provided to the Applicant since CAH3.

- 2.3 As stated in our Deadline 5 submission, Class 8 land is defined in the Book of Reference [REP5-072] as not including temporary possession rights; however the current draft DCO does not exclude temporary possession in Articles 27 (Temporary use of land by National Grid), 28 (Temporary use of land by UKPN and UKOP) and 29 (Temporary use of land for maintaining the authorised development). These articles permit the exercise of temporary possession rights over the land specified in Schedule 11 and “any other Order land”, which would include Class 8 land unless expressly stated otherwise. The SPR Parties trust this will be amended in the next version of the draft DCO.

3. Comments on Deadline 5 Submissions

- 3.1 In the SPR Parties’ Deadline 5 submission [REP5-203], we noted that the Statutory Undertaker Tracker (the most recent version being REP5-267) stated that there are no SPR owned plots affected by compulsory acquisition and that this was incorrect as SPR owns a number of plots identified in the Book of Reference [REP5-072] as Class 1 land (“Compulsory Acquisition of land”). We have since realised that the Statutory Undertaker Tracker is unclear, and that the reference to SPR in the rows for EA1L and EA3L has caused some confusion and should be removed as SPR are not statutory undertakers for this Project for the purposes of section 127 of the Planning Act 2008, whereas EA1L and EA3L are.
- 3.2 The SPR Parties have raised this point with NGET and asked them to remove reference to SPR within these rows to avoid any further confusion.

Yours faithfully



For and on behalf of Shepherd and Wedderburn LLP