

THE EAST ANGLIA TWO LIMITED (FORESHORE)
COMPULSORY PURCHASE ORDER 2026

STATEMENT OF REASONS

ELECTRICITY ACT 1989

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1. Introduction

- 1.1 East Anglia TWO Limited (the “**Acquiring Authority**”) is the holder of an electricity generation licence (the “**Generation Licence**”) granted pursuant to section 6(1)(a) of the Electricity Act 1989 (the “**1989 Act**”) and is developing East Anglia TWO Offshore Windfarm (“**EA2**”), an offshore windfarm in the southern North Sea approximately 32.6km from the Suffolk coast at its nearest point off Southwold and 37.5km to Lowestoft. EA2 is anticipated to have an operational capacity of 960MW which is enough to power the equivalent of around 950,000 homes. As such, EA2 is vital in helping achieve the UK 2030 energy targets by meeting nearly 5% of the United Kingdom’s (“**UK**”) offshore wind cumulative deployment target for 2030.
- 1.2 The Acquiring Authority was granted development consent for EA2 through the East Anglia TWO Offshore Wind Farm Order 2022 on 31 March 2022 pursuant to the Planning Act 2008 (the “**DCO**”). On 3 September 2024, EA2 was awarded a contract for difference (“**CfD**”) for 963.07MW by the UK Government. The construction of EA2 commenced in July 2025 and is due to be commissioned in November 2028.
- 1.3 The Acquiring Authority has made The East Anglia TWO Limited (Foreshore) Compulsory Purchase Order 2026 (the “**Order**”) under the provisions of the 1989 Act. The Order has been made in order to acquire the compulsory acquisition of rights necessary to make landfall, connecting the onshore and offshore elements of EA2.
- 1.4 This is the Statement of Reasons for the Order. This Statement of Reasons has been prepared in accordance with The Ministry of Housing, Communities & Local Government’s “Guidance on the Compulsory Purchase Process” dated October 2024 and last updated January 2025.
- 1.5 This Statement of Reasons sets out the Acquiring Authority’s justification for seeking compulsory purchase powers within the Order. This Statement of Reasons also demonstrates that the public benefits of EA2 outweigh the private rights affected and that there is a compelling case in the public interest for the exercise of the powers of compulsory acquisition included within the Order.

2. Enabling Powers

- 2.1 The Order is made pursuant to Section 10 and Schedule 3 to the 1989 Act.
- 2.2 Paragraph 1 of Schedule 3 to the 1989 Act provides that:
 - (1) *“Subject to paragraph 2 below, the Secretary of State may authorise a licence holder to purchase compulsorily any land required for any purpose connected with the carrying on of the activities which he is authorised by his licence to carry on.*
 - (2) *In this paragraph and paragraph 2 below “land” includes any right over land (other than, in Scotland, a right to abstract, divert and use water); and the power of the Secretary of State under this paragraph includes power to authorise the acquisition of rights over land by creating new rights as well as acquiring existing ones.”*
- 2.3 Section 10 of the 1989 Act provides that Schedule 3 to the 1989 Act has effect in relation to the holder of an electricity generation licence. Paragraph 1(2) clarifies that licence holders are authorised to acquire rights in land as well as the title to land, and that this can be done by creating new rights as well as by acquiring existing rights.
- 2.4 As mentioned above, the Acquiring Authority is the holder of the Generation Licence granted pursuant to Section 6(1)(a) of the 1989 Act.
- 2.5 The activity which the Acquiring Authority is authorised by the Generation Licence to carry out is to generate electricity in Great Britain, in the territorial sea adjacent to Great Britain or in a Renewable Energy Zone (as defined in Section 84(4) of the Energy Act 2004) for the purpose of giving a supply to any premises or enabling a supply to be so given.
- 2.6 The Generation Licence incorporates a standard condition which relates to compulsory purchase:

“Condition 14. Compulsory Acquisition of Land etc.

...

2. The powers and rights conferred by or under the provisions of Schedule 3 to the [1989 Act] (Compulsory Acquisition of Land etc. by Licence Holders) shall have effect in relation to the

licensee to enable the licensee to carry on the activities authorised by this licence and which relate to:

- (a) the construction or extension of a generating station;*
- (b) the operation of a generating station; and/or*
- (c) the installation, inspection, maintenance, adjustment, repair, alteration, replacement or removal of electric lines, and electrical plant associated with them, and any structures for housing or covering such lines or plant, connecting a generating station with:*

- (i) the national electricity transmission system; or*
- (ii) a distribution system-,*

including, for the avoidance of doubt, whether these activities in sub-paragraph (c) are to be carried out by the licensee or another licence holder.

3. In paragraph 2 above:

- (a) the references to “generating station” are to an electricity generating station which:*
 - (i) has, or will have when its construction or extension is completed, a capacity of not less than 50 megawatts or such other capacity as may be specified in relation thereto by order of the Secretary of State under section 36(3) of the Act;*
 - (ii) is, or will be when its extension or construction is completed, operated by or for the licensee”*

- 2.7 The Acquiring Authority may therefore be authorised to purchase compulsorily land or rights over land to enable the Acquiring Authority to carry on the activities authorised by the Generation Licence.
- 2.8 The Acquiring Authority therefore considers that the new rights set out in the Order are required to enable the Acquiring Authority, as an Electricity Act 1989 licensee, to carry on the activities authorised by the Generation Licence and which relate to the operation of a generating station.

3. The Project

- 3.1 The DCO grants the Acquiring Authority development consent for EA2, a nationally significant infrastructure project.
- 3.2 Once complete, EA2 will have:
 - 3.2.1 64 offshore wind turbines and their foundations;
 - 3.2.2 subsea cables connecting the wind turbines and the offshore platforms;
 - 3.2.3 one offshore electrical platform and its foundation;
 - 3.2.4 a network of subsea platform link cables;
 - 3.2.5 up to two offshore subsea export cables to transmit electricity from the offshore electrical platforms to landfall located north of Thorpeness in Suffolk;
 - 3.2.6 landfall connection works north of Thorpeness in Suffolk;
 - 3.2.7 onshore cables commencing at landfall and running to the onshore substation in the vicinity of Grove Wood, Friston;
 - 3.2.8 a new onshore substation in the vicinity of Grove Wood, Friston;
 - 3.2.9 overhead line realignment works in proximity to Grove Wood, Friston including permanent realignment of a short section of the northern and southern overhead line circuits including the reconstruction and/or relocation of up to two pylons and construction of up to one additional pylon in order to realign the northern overhead lines and the reconstruction and/or relocation of up to one pylon in order to realign the southern overhead lines;
 - 3.2.10 temporary diversion of the northern and southern overhead line circuits;
 - 3.2.11 a new National Grid substation (known as Kiln Lane Substation); and
 - 3.2.12 associated development comprising such other works as may be necessary or expedient for the purposes of or in connection with the relevant part of EA2.
- 3.3 EA2 will have a total installed capacity of 960MW.

- 3.4 The landfall connection works consist of up to two export cables, up to two separate fibre optic cables, cable protection and cable ducts laid underground. Two 1,800m (approximate) drills will be constructed using horizontal directional drilling (“HDD”) from the top of the cliff (the entry point will be set back 100m (approximate) from the cliff edge) to the exit point offshore. The cables will then be pulled from the offshore point through a pre-installed duct to the onshore transition joint bay where they will then be connected at either end. The cables will be laid approximately 25m underground.
- 3.5 In addition, the current regulatory framework requires the divestment of the transmission grid infrastructure to an offshore transmission owner (“OFTO”). This process is administered by OFGEM and the undertaker has to acquire the necessary land and rights to provide the OFTO with title to the transmission infrastructure assets. This is required to facilitate the contractual arrangements that provide for the transfer of such assets.
- 3.6 Bespoke rights will need to be acquired to enable construction, operation, maintenance and decommissioning of the landfall works.

4. Interaction with East Anglia ONE North

- 4.1 EA2 is being developed in parallel with East Anglia ONE North Wind Farm (“EA1N”). Separate development consent orders were granted for EA2 and EA1N. The onshore development area, which includes the landfall area, has been developed to allow for the construction of both EA2 and EA1N.
- 4.2 Both EA2 and EA1N will have their own dedicated onshore substation and cables. The substations will be located adjacent to one another. As committed to in the DCO, if EA2 and EA1N are built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using HDD at the landfall for both projects within a similar timeframe.
- 4.3 Construction for EA2 has commenced ahead of EA1N and the ducting for EA1N is likely to be installed at the landfall at a similar time to the EA2 ducting.
- 4.4 East Anglia ONE North Limited will submit their own compulsory purchase order for new rights over the additional foreshore land within which their cables are to be installed.

5. Description of the Order Land

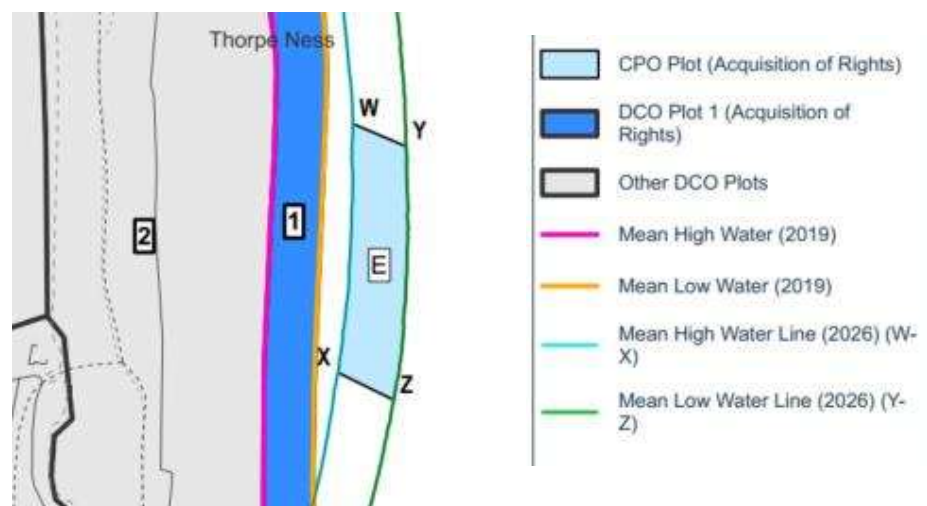
- 5.1 The land over which new rights are to be compulsorily acquired is shown shaded blue and labelled ‘E’ on the Map referred to in the Order.
- 5.2 The Order Land forms part of the foreshore (lying between the updated high water mark and low water mark) of the Suffolk coastline to the north of Thorpeness. The offshore export cables will come ashore here and will be installed by way of trenchless technique below the surface.
- 5.3 The Order Land is an area of tidal shingle beach open to the public, located between the high-water mark and the low-water mark as shown on the Map referred to in the Order. *In keeping with the authorised DCO, a uniformed protective width of 20 metres will generally be applied to the protective rights being sought except where engineering reason give rise to this being wider. In the instance of this Order Land, due to the installation technique and depth of the HDD requiring the two circuits of EA2 to be kept further apart, a wider right of approximately 83 metres is required as illustrated on the “Plot Widths Plan” appended to this Statement of Reasons at Appendix 1.*
- 5.4 The Order Land is defined by fixed lateral limits shown on the Order plan, but with its landward and seaward boundaries defined by reference to mean high water and mean low water from time to time. This reflects established principles of property law governing coastal boundaries and is consistent with the character of the neighbouring titles in the area. It ensures that the land subject to the Order continues to correspond with the foreshore as it changes naturally due to accretion and erosion, without requiring further compulsory powers to be sought in the future solely as a result of such natural movement of the foreshore. This approach is justified when considered in the context of the background and requirement for the Order, as set out in Section 7 below.

6. Rights to be Created

- 6.1 New rights are sought in the Order that will provide the Acquiring Authority and all persons authorised on its behalf with the rights required in connection with the construction, operation, maintenance and decommissioning of the cables, cable protection and ducts and the rights to protect and prevent interference with the cables, cable protection and ducts and associated rights over the Order Land. These rights will be permanent in nature. The new permanent rights sought are:
- 6.1.1 to install, maintain, repair and remove the cables, cable protection and ducts by way of directional drilling or other similar trenchless technique;
 - 6.1.2 to retain and use the cables, cable protection and ducts for the purposes of the transmission of electricity and telecommunications; and
 - 6.1.3 to benefit from continuous vertical and lateral support for the cables, cable protection and ducts in order to protect the integrity of the cables, cable protection and ducts.
- 6.2 As the infrastructure is situated underground, the Order creates new rights in the Order Land compulsorily, as opposed to permanently acquiring the Order Land. The Acquiring Authority's approach to the creation of rights follows a proportionate approach in the use of its powers of compulsory acquisition.

7. Reasons for Making the Order and Justification for the Use of Powers of Compulsory Acquisition

- 7.1 In the period since granting the DCO, an update to mean sea levels has resulted in additional land accumulating at the coast through coastal accretion. In effect, this has created new/additional foreshore at landfall where the underground cables for EA2 will be located (the Order Land). The result is that this additional foreshore land is not within the "Order Land" in the DCO as defined by the Land Plans (the "**DCO Order Land**") and is not therefore subject to the powers of compulsory acquisition. To assist in explaining the issue we have added some additional background below:
- 7.1.1 Plot 1 is identified in the DCO Book of Reference as "foreshore" with the owners or reputed owners stated as "unknown". The extent of Plot 1 in the DCO is shown on the "**Illustrative Foreshore Plan**" appended to this Statement of Reasons at Appendix 2.
 - 7.1.2 At that time, Plot 1 represented the foreshore, namely the land between the mean high water mark and the mean low water mark, as can be seen by the magenta and orange lines on the Illustrative Foreshore Plan. We have also shown an extract below for ease of reference:



- 7.1.3 As a result of the coastal accretion mentioned above, Plot 1 is no longer an accurate depiction of the location of the foreshore. This is illustrated by light blue and green lines above which show the migration of the foreshore to the east, and the resulting discrepancy between Plot 1 and the current location of the foreshore.

- 7.1.4 The DCO Order Land was drawn by reference to the original location of the foreshore (and specifically, the eastern extremity of the DCO Order Land was drawn by reference to the original location of the mean low water mark – i.e. the orange line). As a result, the current foreshore through which the underground cables will be installed (i.e. Plot E above) falls outside the DCO Order Land. This comprises the **Order Land**.
- 7.1.5 For completeness, it can be seen there is a gap between the orange line and light blue line above. This land is also outside the DCO Order Land but does **not** form part of the current Order Land. In 2019, this was part of the sea (i.e. east of the 2019 low water line). In 2026, this land is landward of the foreshore (i.e. above the 2026 high water line). As such, it is to be covered by a voluntary agreement with the neighbouring proprietor Hamish Ogilvie whose registered title extends to the high water line from time to time. Further detail on the neighbouring proprietor's title is included below.
- 7.2 The owner of Plot 2 (as defined in the DCO) which is adjacent to the original Plot 1 foreshore is a Mr Hamish Ogilvie. Plot 2 forms part of the land generally known as the Sizewell Estate and is situated immediately to the west of Plot 1. The registered title to this part of the Sizewell Estate (Title Number SK304715, which we will refer to as the “**Sizewell Title**”) states that “*the boundary between points A and B on the [title] plan is the mean high water mark from time to time and is subject to the effect of accretion and diluvion*”. The effect of this is that the foreshore (being the land between mean high water and mean low water) is not included within the registered title to the Sizewell Estate in the location affected by the cable route. Conversely, the area described in paragraph 7.1.5 above does now form part of the registered title to the Sizewell Estate. This is why the Order Land includes Plot E but not the area described in paragraph 7.1.5.
- 7.3 Notwithstanding this registered position, the Acquiring Authority is aware that there may be some ambiguity as to whether the Sizewell Estate historically included the foreshore in this location. In particular, the Acquiring Authority has reviewed a conveyance dated 21 January 1983 which appears to include within the transferred land areas described as “Beach/Benthills”. This may indicate a discrepancy between the historic conveyance and the extent of the land as subsequently registered. The Acquiring Authority is investigating this position further and is in the process of discussing it with Mr Hamish Ogilvie. However, unless and until the register is clarified or rectified (if appropriate), the Acquiring Authority cannot safely proceed on the basis that the Sizewell Estate includes the foreshore at the landfall location. The timing and outcome of any such rectification process is uncertain, and there can be no assurance that it would be completed in advance of the exercise of the rights required for the Project.
- 7.4 In parallel, the Acquiring Authority has sought to secure voluntary rights from Mr Hamish Ogilvie. An option agreement has been agreed, and will be entered into on and around the date of the Order, which includes the “unregistered foreshore” insofar as he has any estate or interest in it. However, the agreement expressly provides that any such rights are granted only to the extent that Mr Hamish Ogilvie has title (if any), and without title guarantee. Accordingly, whilst these arrangements are helpful, they do not provide sufficient certainty as to the validity of rights over the Order Land.
- 7.5 The land to the east of the foreshore comprises seabed and is owned by The Crown Estate. Again, for present purposes the crucial point is that The Crown Estate does **not** own the foreshore in the location we are concerned with. The Crown Estate denied ownership of Plot 1 during the application and Examination stages of the Projects and have since denied ownership of the Order Land.
- 7.6 Given the uncertainty surrounding the ownership of the Order Land, and the resulting inability to secure sufficiently robust voluntary land rights over it, it is necessary to proceed with the Order in order to obtain the necessary rights.
- 7.7 The Order Land is a vital part of EA2 and is required to bring the offshore HVDC cables onshore which is needed for the Acquiring Authority to operate the EA2 generating station.
- 7.8 The new rights to be created over the Order Land are the minimum necessary to deliver the landfall works. The description of the Order Land by reference to mean high water and mean low water is necessary to ensure the Order Land continues to correspond with the foreshore and neighbouring titles, as set out in paragraph 5.4 above.

- 7.9 As set out in Section 9 below, there is a national need for EA2 and the Acquiring Authority considers that there would be a significant public benefit arising from EA2.
- 7.10 As set out in Section 17 of this Statement, the Acquiring Authority considers that there is no potential for the Order to infringe the rights contained in Articles 1, 6 and/or 8 of the First Protocol of the European Convention on Human Rights (the “Convention”) given the nature of the land in question and that all works will be carried out beneath the Order Land and the use of the Order Land above ground level will not be altered or impeded.

8. Engagement with Affected Parties

- 8.1 The Order Land is unregistered and the identity of the owner remains uncertain. The Acquiring Authority has taken active steps to identify the owner (or reputed owner) of the Order Land. This has included the erection of site notices on or close to the Order Land and discussions with neighbouring landowners to clarify the extent of their ownerships (as noted in Section 7 above).
- 8.2 The Acquiring Authority has also sought to acquire voluntary rights from the most likely owner of the Order Land, as described in Section 7 above. However, those rights are not sufficiently certain to dispense with the need for the Order.
- 8.3 Should any additional owners and/or occupiers of the Order Land become known, the exercise of the compulsory acquisition of new rights will not affect them as the rights relate to HVAC cables which will be situated below ground and access will remain available over the Order Land in its entirety.

9. Public Benefit

- 9.1 Climate change is a global issue which is caused by the increase of carbon emissions into the atmosphere. EA2 would make a significant contribution both to the achievement of UK decarbonisation targets and to global commitments in mitigating climate change. By generating low carbon, renewable electricity in the UK, EA2 will also help to reduce the UK’s reliance on imported energy and will increase energy supply security.
- 9.2 The public benefit of EA2 was considered extensively in the Statement of Reasons accompanying the application for development consent¹. Since then, new National Policy Statements have come into force; however the underlying principle is the same that offshore wind generation is critical to meet the UK’s carbon emission targets and decarbonising the energy system:
- 9.2.1 *“Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero”* (paragraph 4.2.16 of the Overarching National Policy Statement for Energy (EN-1), December 2025); and
- 9.2.2 *“Offshore wind (including floating wind) is expected to play a significant role in meeting demand and decarbonising the energy system. This government is committed to accelerating the deployment of offshore wind to meet the Clean Power 2030 Mission, with an expectation that there will be a need for substantially more installed offshore capacity beyond 2030 to achieve net zero carbon emissions by 2050”* (paragraph 2.8.1 of the National Policy Statement for Renewable Energy Infrastructure (EN-3), December 2025).
- 9.3 Other updates include:
- 9.3.1 **British Energy Security Strategy:** in April 2022 the UK Government published the British Energy Security Strategy in light of the increase of energy demand in the recovery from the Covid-19 pandemic and the Russian invasion of Ukraine. It emphasises that the transition to low-carbon energy must go *“further and faster”* and set a new ambition to deliver 50GW of offshore wind by 2030.
- 9.3.2 **Clean Power 2030 Action Plan:** in December 2024 the UK Government published the Clean Power 2030 Action Plan: A new era of clean electricity (**“Clean Power 2030”**). Clean Power 2030 reiterates the energy security and affordability benefits of pursuing a low-carbon future *“In an era of heightened geopolitical risk, switching fossil fuelled generation for homegrown clean energy from renewables and other clean*

¹ Paragraphs 206 to 217 and 229 to 268.

technologies offers us additional security that fossil fuels simply cannot provide". It also states that "Offshore wind has a particularly important role as the backbone of the clean power system" and that "all routes to a Clean Power system will require mass deployment of offshore wind".

10. Planning Position

- 10.1 EA2, including the landfall works, has development consent pursuant to the DCO.

11. Special Category Land and Other Special Considerations

11.1 Special Kinds of Land

Local authority and statutory undertaker land

- 11.1.1 Sections 16 and 17 of and Schedule 3 to the Acquisition of Land Act 1981 apply to the compulsory acquisition of land and rights over certain specified types of land. There are no said specified types of land within the Order Land.

Open space land

- 11.1.2 The Order Land comprises the foreshore and is subject to the acquisition of rights pursuant to the Order. Although the foreshore has no formal designation as open space, it is currently in use as informal public open space and is accessible by the general public. Therefore, the provisions of Schedule 3 to the Acquisition of Land Act 1981 (the "**1981 Act**") are engaged. This is because of the definition of open space as meaning:

"any land laid out as a public garden, or used for the purpose of public recreation, or land being a disused burial ground"

- 11.1.3 As the Order will authorise the acquisition of rights under land forming part of open space (the foreshore), it will be subject to special parliamentary procedure unless the Secretary of State is satisfied (and certifies accordingly) that the land, when burdened with that right, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before (the "**Rights Test**").
- 11.1.4 A public open space statement has been prepared to support a request to the Secretary of State to grant a certificate pursuant to Paragraph 6 of Schedule 3 to the 1981 Act in respect of the compulsory acquisition of rights over land comprising open space.
- 11.1.5 There is precedent for interconnector projects to treat areas of beach and foreshore as open space and secure certificates from the Secretary of State before confirmation of the Compulsory Purchase Order². These projects also set a precedent in the grant of such certificates pursuant to the Rights Test for similar projects.
- 11.1.6 The Order Land will be subject to rights to install HVAC cables, cable protection and ducts beneath the Order Land using trenchless installation techniques, as well as rights to operate, maintain and decommission said cables. The use of the Order Land when burdened with these rights will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before. This is because, during construction, the entrance and exit pits for the Horizontal Directional Drilling will be outside of the Order Land and following construction of EA2, the HVAC cables, cable protection and ducts will be situated below ground and public access will remain available over the Order Land in its entirety.
- 11.1.7 The Acquiring Authority will request that the Secretary of State certify under Paragraph 6(1)(a) of Schedule 3 to the 1981 Act that the Order Land, when burdened with the rights, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before.

² For example, The National Grid North Sea Link Limited (East Sleekburn) Compulsory Purchase Order 2016, The FAB Link Limited (Budleigh Salterton to Broadclyst) Compulsory Purchase Order 2016, The National Grid Electricity Transmission PLC (Scotland to England Green Link 1) Compulsory Purchase Order 2023 and The National Grid Electricity Transmission PLC (Scotland to England Green Link 2) Compulsory Purchase Order 2023.

- 11.1.8 The Order Land satisfies the Rights Test.

Crown land

- 11.1.9 The Crown Estate has confirmed that it does not own the Order Land.

Protected assets

- 11.1.10 There are no listed buildings, buildings subject to a building preservation notice, buildings which may qualify for inclusion in the statutory list, registered parks or gardens, buildings within a conservation area of scheduled monuments within the Order Land.

12. 1989 Act Consent

- 12.1 Paragraph 2 of Schedule 3 to the 1989 Act provides that the Secretary of State may not confirm an Order authorising the acquisition of land belonging to another electricity licence holder except with the consent of the Gas and Electricity Market Authority (“GEMA”).
- 12.2 The Order does not include the acquisition of land belonging to another electricity licence holder. Therefore, no consent is required from GEMA.

13. Mines and Minerals

- 13.1 Parts 2 and 3 of Schedule 2 to the 1981 Act are expressly incorporated within the Order. These Parts of Schedule 2 to the 1981 Act concern the ‘Mining Code’, and they are incorporated in order to safeguard and protect all apparatus and other equipment which will be constructed and/or installed by the Acquiring Authority and its contractors for the purposes of the Order Land.

14. Funding

- 14.1 The Acquiring Authority was awarded a CfD on 3 September 2024. The CfD is the Government’s main mechanism for supporting low-carbon electricity generation. CfDs incentivise investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high. CfDs incentivise investment due to the offer of stable revenue.
- 14.2 In order to fund construction, the funding organisation for all investments made in relation to EA2 is Iberdrola, S.A., (“Iberdrola”). The Acquiring Authority is an indirect wholly owned subsidiary of Iberdrola, a Spanish public listed company. The Iberdrola Group is one of the world’s largest integrated utility companies and a world leader in wind energy. Iberdrola achieves the highest credit rating (BBB+Baa1), as assessed by Moody’s, Fitch IBCA and Standard & Poor, which can be relied upon to prove Iberdrola’s financial robustness for the purposes of this application. Iberdrola is a publicly traded company listed on the Madrid Stock Exchange (IBE: MC) and its share performance is included in the computation of the Spanish IBEX 35 index, with a shareholder base made up largely of international investors. ScottishPowerRenewables (UK) Limited (“SPR”) is the parent company and 100% direct owner of the Acquiring Authority. SPR’s consolidated accounts for the year ended 31 December 2024 stated total fixed assets of £3,823.8m. Funding into the Acquiring Authority will be provided via a combination of equity and loans.
- 14.3 For the reasons set out above, the Acquiring Authority will have the necessary funds to meet the capital expenditure for the cost of EA2 and the cost of acquiring the necessary rights over land (whether compulsorily or by agreement) and any compensation otherwise payable as a result of the exercise of the powers in the Order.
- 14.4 It is not anticipated that any statutory blight claims will arise as a consequence of the Order, although should any claims arise, the costs of meeting claims that are upheld will be met by the Acquiring Authority from the sources of funding described above.
- 14.5 All of EA2 is to be disregarded for the purposes of the assessment of compensation in the “no scheme” world.

15. Programme of Works

- 15.1 The Acquiring Authority awarded contracts for the cable works and the onshore works commenced in October 2025. The EA2 landfall works are due to start in later in 2026. The construction of EA2 as a whole is anticipated to complete in Q4 2028.

16. Other Consents and Related Applications

- 16.1 The Acquiring Authority has already been granted development consent for EA2 through a development consent order.
- 16.2 The Landfall Method Statement and Monitoring Plan, including the Hydrogeological Risk Assessment – Landfall Works which was appended thereto, was approved by East Suffolk Council on 10 February 2026 pursuant to Requirement 13 of the DCO.
- 16.3 As mentioned in section 4 above, East Anglia ONE North Limited will be applying for a similar compulsory purchase order in relation to EA1N over land adjacent to the Order Land in connection with the EA1N landfall works.
- 16.4 There are no other related applications save for the request for a certificate pursuant to Schedule 3 to the 1981 Act in respect of the rights to be acquired over public open space.
- 16.5 Where any consents or licences are required other than those already mentioned in this Statement of Reasons, the necessary applications will be made to the appropriate consenting authority. The Acquiring Authority is not aware of any reasons why such consents or licences would not be granted.

17. Human Rights

- 17.1 The Human Rights Act 1998 incorporated into UK law the Convention. The Convention includes provisions in the form of Articles, the aim of which is to protect the rights of the individual.
- 17.2 The following Articles of the Convention are relevant to the Secretary of State's decision as to whether to confirm the Order:
 - 17.2.1 **Article 1 of the First Protocol:** this protects the right of everyone to peaceful enjoyment of possessions and provides that no one can be deprived of their possessions except in the public interest and subject to the relevant national and international laws and principles.
 - 17.2.2 **Article 6 of the First Protocol:** this entitles those affected by the powers sought in the Order to a fair and public hearing of any relevant objections they may have to the granting of those powers. This includes property rights and can include opportunities to be heard in the decision-making process.
 - 17.2.3 **Article 8 of the First Protocol:** this protects private and family life, home and correspondence. No public authority can interfere with these rights except such as in accordance with the law and is necessary in the interest of national security, public safety or the economic well-being of the country.
- 17.3 The Secretary of State, as the decision maker, is under a duty to consider to what extent the Acquiring Authority's exercise of powers of compulsory purchase would be affected by the rights protected by the Convention.
- 17.4 The Acquiring Authority considers that there is no potential for the Order to infringe the Convention rights given the nature of the land in question and that all works will be carried out beneath the Order Land and the use of the Order Land above ground level will not be altered or impeded.
- 17.5 Despite this, the Acquiring Authority considers that there would be a significant public benefit arising from EA2 and EA2 can only be delivered if the compulsory purchase powers within the Order are granted.
- 17.6 Consultation has been carried out as part of the DCO pre-application, application and Examination stages for EA2. The Acquiring Authority will follow the existing legislative provisions relating to compulsory purchase and this allows for objections to be made and compensation is payable to those affected by the Order in accordance with the statutory Compensation Code.
- 17.7 Should the Order be confirmed, any person aggrieved may challenge the Order in the High Court.
- 17.8 In relation to matters of compensation for new rights to be acquired, affected persons have the right to apply to the Upper Tribunal (Lands Chamber), which is an independent judicial body to determine the compensation payable.
- 17.9 For the above reasons, any infringement of the Convention rights of those whose interests are affected by the Order, is proportionate and legitimate and is in accordance with national and European law.

- 17.10 For the reasons set out in this Statement, the Acquiring Authority considers that there is a compelling case in the public interest for the exercise of such powers of compulsory purchase. The Acquiring Authority considers that it would, therefore, be appropriate and proportionate for the Secretary of State to confirm the Order.

18. Public Sector Equality Duty

- 18.1 The Equality Act 2010 (the “**2010 Act**”) harmonised, consolidated and extended previous legislation designed to prohibit discrimination on the ground of protected characteristics. The 2010 Act identifies nine protected characteristics. Unless otherwise stated, the below definitions are based on those provided by the Equality and Human Rights Commission:
- 18.1.1 **Age:** this refers to a person belonging to a particular age or range of ages;
 - 18.1.2 **Disability:** a person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities;
 - 18.1.3 **Gender reassignment:** where a person undergoes, or proposes to undergo, a process for the purpose of reassigning their sex;
 - 18.1.4 **Marriage and civil partnership:** marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the 2010 Act);
 - 18.1.5 **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.;
 - 18.1.6 **Race:** a race is a group of people defined by their colour, nationality (including citizenship) ethnicity or national origins. A racial group can be made up of more than one distinct racial group;
 - 18.1.7 **Religion or belief:** religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition;
 - 18.1.8 **Sex:** this refers to a man or to a woman;
 - 18.1.9 **Sexual orientation:** whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.
- 18.2 Section 149 of the 2010 Act places a public sector equality duty on public authorities when exercising their functions. In the current context that duty will apply to the Secretary of State when making a decision in respect of the Order. The equality duty requires public bodies to have due regard to the need to:
- “a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*
- 18.3 A Public Sector Equality Statement was produced for EA2 (and EA1N) and submitted during the Examination. It assessed the EA2 project as a whole and concluded that no differentiated or disproportionate impacts on groups with protected characteristics under the 2010 Act are predicted as a result of any phase of EA2 (and EA1N). The Secretary of State in his decision letter concluded that EA2 *“will not result in any differential impacts on people sharing any of the protected characteristics. The Secretary of State concludes, therefore, that granting the [DCO application] is unlikely to result in a substantial impact on equality of opportunity or relations between those who share a protected characteristic and others or unlawfully discriminate against any particular protected characteristics.”*
- 18.4 The Acquiring Authority considers that the Public Sector Equality Statement remains relevant and up to date in relation to EA2 as a whole and that the nature of the land in question and that

the new rights sought under the Order will not restrict public access over the Order Land. As such, the Order will not result in any differential impacts on people sharing any of the protected characteristics. The Acquiring Authority considers that it would, therefore, be appropriate and proportionate for the Secretary of State to confirm the Order.

19. Publicity, Objection Period and Further Information

- 19.1 The Order, schedules, maps and Statement of Reasons (the “**Order Documents**”) will be available for viewing on the EA2 website:

<https://www.scottishpowerrenewables.com/offshore/east-anglia/east-anglia-two/east-anglia-two-document-library>

- 19.2 The Order Documents will also be available for inspection free of charge at:

Location	Address	Times	Notes
East Suffolk Council	Woodbridge Library New Street Woodbridge Suffolk IP12 1DT	Monday: 10am to 4pm Tuesday and Friday: 9.30am to 7.30pm Wednesday and Thursday: 9am to 5.30pm Saturday: 9am to 5pm Sunday: 10am to 4pm	Hard copy of the full suite of application documents
Leiston Town Council	Main Street Leiston IP16 4ER	Monday and Tuesday: 9am to 12.30pm and 2pm to 4.45pm Thursday and Friday: 9am to 12.30pm Alternatively contact 01728 830388 to make an appointment.	Hard copy of the full suite of application documents

- 19.3 USB device copies of the Order Documents can also be provided free of charge on request by emailing eastangliatwo@scottishpower.com.

20. Conclusion

- 20.1 The new rights set out in the Order are required to deliver the construction, operation, maintenance and decommissioning of the cables at landfall over the additional foreshore land created by the recent update to mean sea levels. The landfall works form a vital part of EA2 and must be carried out in order for the Acquiring Authority to connect and operate the EA2 generating station.
- 20.2 The Order Land is unregistered and its ownership remains uncertain. The Order Land is also outside of the DCO Order Land. Therefore, there is no sufficiently robust alternative to acquire the required rights in the Order Land other than by compulsory purchase.
- 20.3 The Acquiring Authority therefore considers that the new rights set out in the Order are required to enable the Acquiring Authority, as a 1989 Act licensee, to carry on the activities authorised by its licence and which relate to the operation of the generating station.
- 20.4 The new rights are no more than are reasonably necessary and will not result in any serious detriment to any persons or entities. Furthermore, there is a compelling case in the public interest for the rights over land to be acquired given the positive benefits that EA2 will generate, particularly in view of current UK policy in relation to renewable energy.
- 20.5 In addition:
- 20.5.1 reasonable alternatives to compulsory purchase have been explored;
 - 20.5.2 it has been demonstrated that any interference with rights is for a legitimate purpose, is necessary and is proportionate;
 - 20.5.3 a description of the intended rights to be acquired has been provided;
 - 20.5.4 an explanation has been provided as to how it is expected that EA2 and the acquisition of the rights over the Order Land will be funded, as well as compensation in respect of the exercise of powers of compulsory purchase, which demonstrates that there is a reasonable prospect of the requisite funds being available; and

- 20.5.5 Articles 1, 6 and 8 of the First Protocol of the Convention have been considered.
- 20.6 It is therefore submitted that the Order be confirmed.

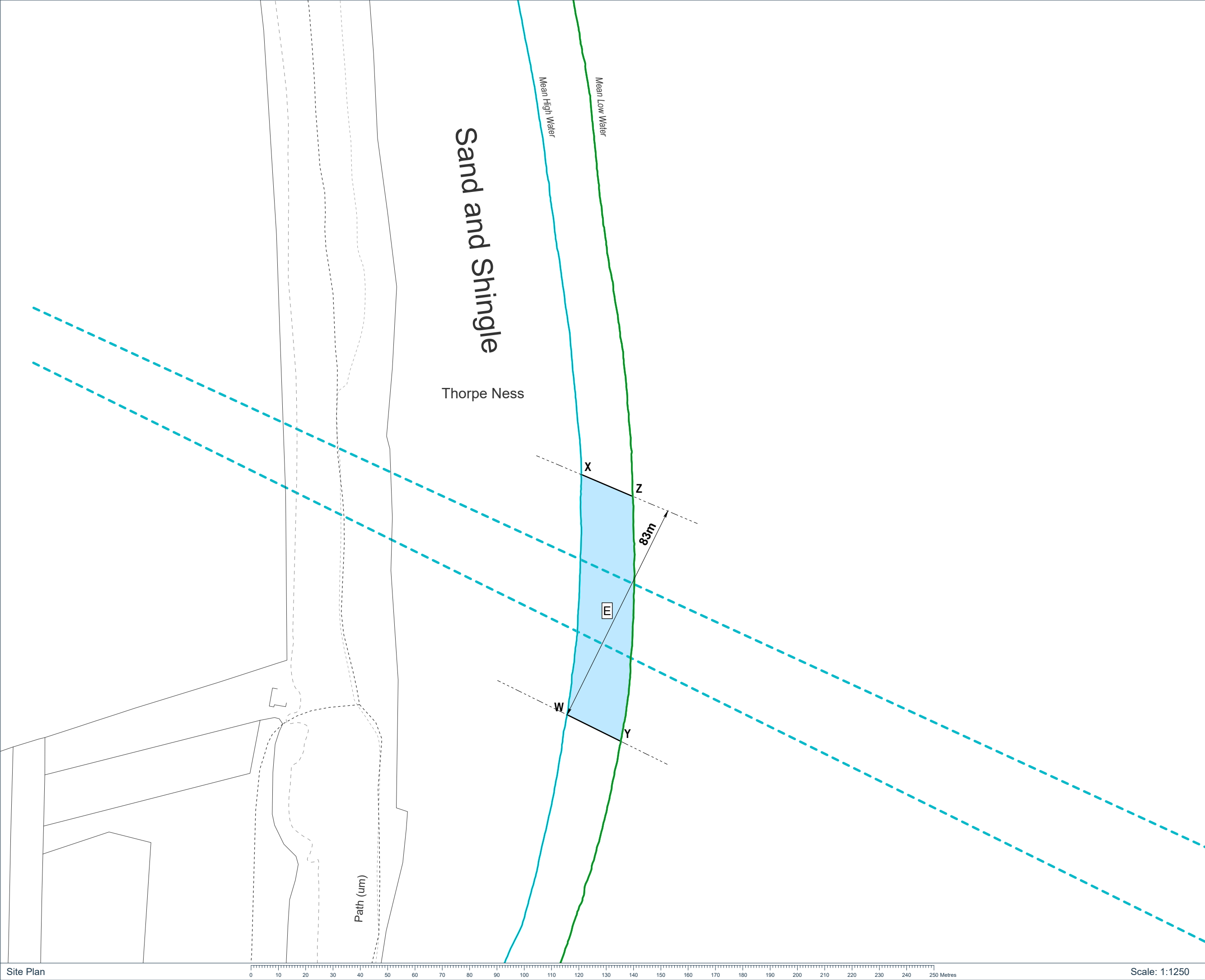
21. List of Documents in Case of Public Inquiry

- 21.1 In the event of a public inquiry, the Acquiring Authority would intend to refer to or put into evidence the following documents, maps and plans:
- 21.1.1 Order and map referred to in the Order;
 - 21.1.2 Statement of Reasons for the Order;
 - 21.1.3 Generation Licence dated 3 December 2020;
 - 21.1.4 The East Anglia TWO Offshore Wind Farm Order 2022;
 - 21.1.5 Land Plans;
 - 21.1.6 Public Sector Equality Statement;
 - 21.1.7 DCO Statement of Reasons (2021); and
 - 21.1.8 Landfall Method Statement and Monitoring Plan.
- 21.2 The Acquiring Authority reserves the right to supplement the above list in the event of a public inquiry into the Order.

Dated:

Appendix 1
Plot Widths Plan

Drawing Location: C:\Users\PhilRees\Documents\East Anglia Two\180476 (Inactive) - Geomatics\01 DM Plans\20260331_180476_PLN_CPO_2865.1.aprx



- Key:
- Acquisition of Rights
 - Mean High Water Line (W-X)
 - Mean Low Water Line (Y-Z)
 - EA2 Indicative HDD Route
 - Measurement
 - Width

Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Land to the north of Thorpeness, Suffolk,
IP16 4PD

Coords: 647755, 260737

Scheme Name:
East Anglia TWO Project

Drawing Name:
Plot Widths Plan

Drawing No: 180476_PLN_INFO_2897.1

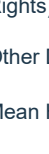
Rev	Date	Description
-	27.07.2026	First Issue

Drawn:	PR	
Approved:	HH	
Sheet No:	1 of 1	
Sheet Size:	A3	



Appendix 2
Illustrative Foreshore Plan





**DALCOUR
MACLAREN**

Key:

CPO Plot (Acquisition of Rights)

DCO Plot 1 (Acquisition of Rights)

Other DCO Plots

Mean High Water (2019)

Mean Low Water (2019)

Mean High Water Line (2026) (W-X)

Mean Low Water Line (2026) (Y-Z)

Notes:

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936

Interest:
N/A

Location:
Land to the north of Thorpeness, Suffolk,
IP16 4PD

Coords: 647642, 260712

Scheme Name:
East Anglia TWO Project

Drawing Name:
Illustrative Foreshore Plan

Drawing No: 180476_PLN_INFO_2899.1

Rev	Date	Description
-	27.07.2026	First Issue

Drawn:	PR
Approved:	HH
Sheet No:	1 of 1
Sheet Size:	A3





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