

10 February 2026

National Infrastructure Planning
Temple Quay House
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Dear Examining Authority

Sea Link Project (the “Project”)

Application Ref: EN020026

**ScottishPower Renewables (UK) Limited, East Anglia ONE North Limited and East Anglia TWO Limited’s
Deadline 4 Submission**

1. Introduction

- 1.1 We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited (“**SPR**”), East Anglia ONE North Limited (“**EA1NL**”) and East Anglia TWO Limited (“**EA2L**”).
- 1.2 SPR is the parent company of EA1NL, who has the benefit of the East Anglia ONE North Offshore Wind Farm Order 2022 (“**EA1N**”), and EA2L, who has the benefit of the East Anglia TWO Offshore Wind Farm Order 2022 (“**EA2**”). EA1N, EA2L and SPR are interested parties to the examination of the application for development order for the Project (the “**Examination**”).
- 1.3 Please find below our submissions for Deadline 4 on 10 February 2026, along with the below separate submissions:
- 1.3.1 Appendix 1 - Written Summary of Oral Case – Compulsory Acquisition Hearing 1; and
- 1.3.2 Appendix 2 - Written Summary of Oral Case – Issue Specific Hearing 2 (“**ISH2**”).

2. Comments on Responses to First Written Questions

- 2.1 Please find in Schedule 1 attached hereto our comments on the Applicant’s responses to 1GEN39 and 1TT17 [REP3-069].

3. Response to Action Points arising from ISH2

- 3.1 Please find in Schedule 2 attached hereto our response to the action points arising from ISH2 [EV6-033].

Yours faithfully



For and on behalf of Shepherd and Wedderburn LLP

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SCHEDULE 1 - COMMENTS ON RESPONSES TO EXQ1

Reference	Question	Applicant's Response	Comment
1GEN39.	<p>Article 44 Explain the implications for the inclusion of paragraphs (2) to (4) and signpost to similar paragraphs within made orders. Update the explanatory memorandum and other core documents accordingly. Statutory undertakers to also provide comment.</p>	<p>Paragraphs (2)-(4) apply the provisions of the TCPA 1990 Ss.271-274 where apparatus are provided outwith the Order Limits. Those sections provide for notice to statutory undertakers and telecoms operators, and counter-notices to be issued and a process for resolution in such circumstances. In essence they provide protection for statutory undertakers and telecoms operators. The Applicant has reflected on the position and considers that the material protections provided by these notification provisions are addressed via the Protective Provisions. The Applicant has further considered the recent precedents and has updated the draft DCO to align with the most recent precedent (being the Bramford to Twinstead DCO 2024).</p>	<p>EA1NL And EA2L confirm they have no comments on the Applicant's amendments to Article 44 but reiterate the need for bespoke protective provisions to be included in the Development Consent Order.</p>
1TT17.	<p>Coordination of PRow closures and diversions Within the REAC [CR1-043], under commitment GG32, it is stated that to reduce the potential for significant overall cumulative effects, PRow closures/diversions would be coordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. However, whilst this may be the applicant's intention, explain how this could be considered as a secured commitment when it would depend on another developer.</p>	<p>The Applicant is committed to on-going engagement with other projects including EA1N / EA2 to identify potential opportunities for co-ordination during project delivery and to minimise potential impacts on Public Rights of Way (PRow), and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. Further details of this engagement and any additional mitigation to minimise the potential or duration of any potential significant cumulative effects on PRow will be documented and secured as part of the Suffolk Public Rights of Way Management Plan (PRowMPP) through Requirement 6 of Schedule 3 of Application Document 3.1 (F) draft Development Consent Order, submitted at Deadline 3. No single party has authority over another and each DCO only controls the activities for that project. For these reasons, a firm commitment cannot be made to prepare or agree a Joint Suffolk PRowMPP with Scottish</p>	<p>Ahead of construction of the EA1N and EA2 substations and National Grid's Kiln Lane substation under the EA1N and EA2 DCOs, permanent diversion of a section of PRow E-354/006/0 will be required. As mitigation, an alternative permanent footpath is being created, so that this route will be established for use prior to the closure of this section of E-354/006/0. Once this section is closed, users will be able to use the newly created footpath in its place.</p> <p>EA1NL and EA2L's works to create a permanent footpath as a result of the permanent diversion of PRow E-354/006/0 is set to be completed in March 2026, with formal adoption as a PRow expected to follow thereafter.</p> <p>As such, any further changes to the PRow required for Sea Link would be a matter for the Applicant to manage with the local authority.</p>

		<p>Power Renewables (SPR) for example. Therefore, it is the Applicant's intention to develop the Suffolk PRowMP for the Proposed Project post-consent, once the Proposed Project is developed during detailed design and further details are known for EA1N / EA2 e.g. project timeframes and potential impacts/ mitigation on any shared PRow receptors. The Applicant will consult SPR as part of this process, so that any potential cumulative impacts on PRow can be identified and minimised such as by coordinating works to minimise the number or duration of any PRow closures and diversions.</p>	
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SCHEDULE 2 – RESPONSE TO ACTION POINTS ARISING FROM ISH2

Action	Description	Response
69	Provide a form of requirement wording, co-ordinated with SPR, that would enable the previous East Anglia 1 North Requirement 27 noise limit requirements for Friston/Kiln Lane substation to be satisfied.	The Applicant has advised the SPR parties that they do not propose to include requirement wording regarding operational noise. The SPR parties are considering the Applicant's position and will respond further at Deadline 5.
82	Applicant to update the drainage plan for Friston substation in coordination with SPR	SPR confirm the Applicant has liaised with them regarding updating their drainage plan for the National Grid Kiln Lane substation. The Applicant has had sight of the EA2 Operational Drainage Management Plan submitted for discharge and was involved in discussions prior to its submission. SPR understand from the Applicant that the Project will not result in an increase of water to be discharged during the operational phase and as such the Applicant's drainage plan will replicate the EA2 Operational Drainage Management Plan once approved.
114	Consider and provide a response to the position that SPR do not have an equivalent to article 10 in their DCOs	This Article has been included in response to the Supreme Court's ruling in <i>Hillside Parks Ltd v Snowdonia National Park Authority (2022)</i> (" Hillside "), despite it not being clear whether Hillside would apply to development consent orders. The EA1N and EA2 Development Consent Orders were granted before Hillside and as such do not include equivalent wording. SPR do not see this as an issue. Furthermore, the fact that the EA1N and EA2 development consent orders do not have wording equivalent to the Project's Article 10 is not a concern for the Project, nor this Examination.
116	All parties (including NGV, SPR and Manston airport) from onshore of offshore existing or potential future consent to comment on article 10.	SPR do not have any concerns regarding Article 10 as drafted in the Project's draft Development Consent Order.