

OUR REF S6152.28/CBW/CWI
YOUR REF
10 February 2026

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

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 – Written Summary of Oral Case for Issue Specific Hearing Two (“ISH2”)**

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**”) (together, the “**SPR parties**”).
- 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**”).
- 1.3 ISH2 for the Project took place in person and virtually between 28-30 January 2026. Mr Colin Innes, Partner at the law firm Shepherd and Wedderburn LLP gave oral submissions on behalf of the SPR parties at ISH2 under Agenda Item 9 (Landscape and Visual).
- 1.4 This post-hearing submission contains a written summary of the oral submissions delivered by Mr Innes and contains the SPR parties’ written submissions in respect of other matters discussed at ISH2.

2. Written summary of oral submissions – Landscape effects

- 2.1 Mr Innes made oral submissions in respect of agenda item 9.5, regarding landscape effects at the National Grid Kiln Lane substation.
- 2.2 Mr Innes explained the landscape mitigation process secured in respect of the Kiln Lane substations under EA1N and EA2. That is, that EA1NL and EA2L committed to a holistic approach to design of the Kiln Lane substations, including in respect of landscape mitigation.
- 2.3 As explained by Mr Innes, this approach is set out in the outline landscape and ecological management strategy (“**OLEMS**”),¹ and substation design principles statement (“**SDPS**”) ² for EA1N and EA2. Compliance with these documents is secured through requirements 12 (detailed design parameters onshore), 14 (provision of landscaping) and 21 (ecological management plan) of EA1N and EA2.

¹ Version 8, submitted to the Secretary of State in respect of the applications for EA1N and EA2, dated 31 January 2022.

² Version 4, submitted to the Secretary of State in respect of the applications for EA1N and EA2, dated 21 June 2022.

- 2.4 Those documents, together with the requirements in EA1N and EA2 established a framework through which final landscape mitigation must be developed at the Kiln Lane substations. A core element of this framework is that extensive consultation with communities, local authorities and other stakeholders is required in the development of a 'landscape masterplan' (see, in particular, design principles 4, 5, 6, 7 and 16 in table 5.1 of the SDPS and the detailed engagement strategy in Appendix A of the SDPS). We note the landscape masterplan is also required to respond to technical constraints onsite. The nature of the approach secured through these documents was such that stakeholders always anticipated that the mitigation proposed in the landscape masterplan would evolve through the iterative design process.
- 2.5 As discussed during ISH2, the final Landscape Management Plan ("LMP") for the Kiln Lane substations has now been submitted to the local authority in accordance with requirement 14 of EA1N and EA2. The LMP was developed in accordance with the framework outlined above and, as is to be anticipated, the landscape framework proposed has evolved from that illustrated in plans during the examinations for those projects. The OLEMS specifically acknowledged that landscape mitigation was likely to be refined as a result of consultation under the SDPS.³
- 2.6 The SPR parties committed under EA1N and EA2 to a collaborative process to develop appropriate landscape mitigation, and this process has been implemented. This approach is consistent with the principles of good design (which, it is noted, is an important factor in the Secretary of State's decision making under NPS-EN1).
- 2.7 During ISH2, Mr Innes also addressed the final bullet point of paragraph 40 of the OLEMS, which the Applicant highlighted in its deadline 3 submissions [REP3-070]⁴ and which states:
- "The measures covered by this OLMP include*
- (...)*
- *This OLMP provides a strategic core of landscape planting proposals for development which accommodates either AIS (Air Insulated Switchgear) or GIS (Gas Insulated Switchgear) National Grid substation designs (refer to **Chapter 6 Project Description** for associated parameters for AIS or GIS NGET substation designs). The outline design of the strategic planting proposals of the landscape scheme (i.e. that planting which provides the most effective landscape framework and visual mitigation) is such that it does not sterilise land for potential future development associated with the National Grid substation, although future consultation with stakeholders and local communities (under the **Substations Design Principles Statement** (AS-133)) may result in the refinement of the landscaping proposals. Any landscaping or surface water infrastructure established for the East Anglia ONE North project which subsequently requires modification due to any future extension of the National Grid substation must be considered as part of any future consent application for an extension, and must ensure no detriment to the East Anglia ONE North project."*
- 2.8 During the examination for EA1N and EA2, National Grid Ventures raised concerns regarding how landscaping might influence the ability to extend the National Grid Kiln Lane AIS substation by adding extensions to the East and West. These extensions were tested and the indicative OLEMS detailed how they could be facilitated notwithstanding the landscaping proposals. This is reflected in the first part of the text at paragraph 40 of the OLEMS, quoted above. The text in the bullet point goes on to acknowledge that future schemes were likely to interact with the wider landscaping proposed.

Further submission on landscape

- 2.9 The SPR parties would also like to highlight that, contrary to assertions in the Applicant's deadline 3 submissions,⁵ the consultation process for the development of the landscape mitigation now proposed was not 'confidential' or closed. Representatives for the Applicant were present at three of the four engagement events held by EA1NL and EA2L on the development of the LMP for the Kiln Lane substations. The SPR parties have consulted closely with the Applicant throughout the design process

³ At [40].

⁴ Please note the Applicant refers to paragraph 39 of the OLEMS. It appears that the Applicant is referring to an earlier version of the OLEMS (version 7). We confirm the text quoted is unchanged in the current version of the OLEMS but now appears at paragraph 40.

⁵ [REP3-070] at D.1.16 and D.1.19.

for the LMP under requirement 14 of EA1N and EA2, including on the final draft plans. The proposed design was refined to reflect comments by the Applicant and specific text addressing the Project was added to the LMP at the Applicant's request.

- 2.10 Notwithstanding the above, the SPR parties understand changes may be required to the landscape mitigation proposed under the LMP, in order to accommodate the Project. Any changes required must be approved through a separate process, however, the SPR parties have been working closely with the Applicant to understand how this can be managed. A plan showing the ultimate landscape mitigation which would accommodate the Project and EA1N/EA2 is close to finalisation and the SPR parties are working with the Applicant regarding how implementation of the landscape mitigation can be managed.

3. Post hearing submission on other matters

- 3.1 The SPR parties have interests in other matters addressed at ISH2, which they did not address orally. The SPR parties' submissions on those points are set out briefly below and in the accompanying response to the examining authority's action points [EV6-033].

Noise

- 3.2 During ISH2, under agenda item 10, the need for an operational noise limit at the National Grid Kiln Lane substation within the Applicant's development consent order was discussed. As part of this discussion, the Applicant outlined that the substation would not house any significant noise making equipment.
- 3.3 The SPR parties can confirm that, under EA1N and EA2, the major contributor to new noise was from the two project substations. The National Grid Kiln Lane substation was not predicted to make a material contribution to operational noise from the developments in normal conditions. The only circumstances in which it was assessed that the National Grid Kiln Lane substation was likely to make a contribution to noise was during occasional testing of switch gear. It is noted that requirement 27 of EA1N and EA2 applies to noise in standard operating conditions.
- 3.4 This is consistent with the position put forward by the Applicant during the examination. The SPR parties note an action point (AP69) on this matter has been directed towards themselves and the Applicant. The SPR parties' response to that is provided in the cover letter which accompanies this submission.

Yours faithfully



For and on behalf of Shepherd and Wedderburn LLP