

OUR REF S6152.28/CBW/CWI
YOUR REF
13 April 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 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 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 This submission provides a written summary of oral case for Compulsory Acquisition Hearing 2 (“**CAH2**”) and responses to ExQ3.

2. Written Summary of Oral Case – CAH2

- 2.1 CAH2 for the Project took place in person and virtually on 25 March 2026. Mr Colin Innes, Partner at the law firm Shepherd and Wedderburn LLP, gave oral submissions on behalf of the SPR parties at CAH2 under Agenda Items 2 (Section 122 and 123 of the Planning Act 2008 (PA2008)) and 4 (Sections 127 and 138 of the PA2008 and Schedule 15 of the dDCO – Protective Provisions).

Agenda Item 2 – Section 122 and 123 of the PA2008

- 2.2 The SPR parties are continuing to provide National Grid Electricity Transmission Plc (the “**Applicant**”) with up-to-date information various land interests held at the Kiln Lane Substation site. The Applicant prior to CAH2 had been relying on HM Land Registry searches which has resulted in the SPR parties’ land interests being misrepresented in the Book of Reference [REP5-015] and other land documents due to the delay in HM Land Registry processing applications and updating their records. These misrepresentations included SPR parties being identified as reputed owners of land that they do not own, or having options over land which they do not.
- 2.3 The SPR parties and the Applicant held a meeting to discuss these points on Wednesday 1 April 2026. Following this on 2 April 2026, the SPR parties provided the Applicant with spreadsheets, shapefiles and notes to ensure the Applicant has all of the information required to accurately capture the land interests of the SPR parties. The Applicant provided the SPR parties with updated land documents (including the Book of Reference and Land Plans) on 10 April 2026. After review, the SPR parties

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confirm that the Applicant's updated land documents now accurately reflect the current interests of the SPR parties. Evidence of any additional land acquired by the SPR parties, including updated spatial data and evidence of the transfers, will be provided to the Applicant to enable further updates to be made to their land documents.

- 2.4 The SPR parties also explained to the Applicant at this meeting which areas of land the SPR parties are aiming to still purchase and provided an expected timeline for these. These areas of land are coloured pink on the composite land interests plan attached at **Appendix 1**. It is expected that the majority of this land will be purchased by the SPR parties by May 2026. It was explained at CAH2 that some land deals are dependent on others, so some cannot complete until certain ones complete as they are reliant on access etc.
- 2.5 The abovementioned plan also shows the land currently owned by SPR parties in red and the land the SPR parties have an option agreement over to purchase land but have not yet exercised the option in green. SPR does not currently have any plans to purchase additional land at the Kiln Lane Substation other than that shown coloured pink on the abovementioned plan but this might change when construction of the EA2 onshore substation begins and when the timings for EA1N are more certain.
- 2.6 The SPR parties and the Applicant have made good progress on the transfer of benefit agreement ("**TOBA**") and land transfer and negotiations are advanced. However, it is difficult to say whether these will complete before the close of the Examination. If they do not, it will not be long after.
- 2.7 Once the TOBA and land transfer complete, the Applicant will acquire the land and rights over the SPR parties owned land that the Applicant requires in order to construct the Kiln Lane Substation and associated infrastructure on land owned by the SPR parties. The SPR parties are also willing to grant the Applicant the relevant rights required for the Sea Link cables over land owned by the SPR parties as part of the land transfer process but are waiting for the Applicant to provide details to enable this to be discussed further. Therefore, the SPR parties continue to object to compulsory acquisition of land and new rights being kept in the Projects' Development Consent Order ("**DCO**") once the TOBA and land transfer completes. This is a key issue for the SPR parties due to the potential impact that continued compulsory acquisition powers over land owned by the SPR parties could have on EA2L and EA1NL when they are required by Ofgem to transfer the transmission assets to an Offshore Transmission Owner ("**OFTO**"), or when the SPR parties are trying to agree mitigation measures with landowners.
- 2.8 As mentioned in the SPR parties' Deadline 4 submission [REP4-113], it is our view that there should be a requirement in the Project's DCO that the compulsory acquisition powers no longer required for these works should fall out of the Project's DCO. This could be drafted on a scenario basis similar to what was granted in the Norfolk Boreas Offshore Wind Farm Order 2021.
- 2.9 The SPR parties are continuing to work together with the Applicant to agree a set of protective provisions to be included in the Project's DCO. Should agreement not be reached on all points, the SPR parties will submit their wording for any areas outstanding at Deadline 7 as per the ExA's request at CAH2 and Action Point 31.

Agenda Item 4 - Sections 127 and 138 of the PA2008 and Schedule 15 of the dDCO – Protective Provisions

- 2.10 The SPR parties submitted draft protective provisions at Deadline 5 (Appendix 1 of [REP5-171]) which comprised of:
- 2.10.1 General protective provisions for SPR;
 - 2.10.2 General protective provisions for EA1NL;
 - 2.10.3 General protective provisions for EA2L;
 - 2.10.4 Cable crossing protective provisions for EA1NL; and
 - 2.10.5 Cable crossing protective provisions for EA2L.
- 2.11 The Project's cables will cross the onshore cables for EA1NL and EA2L south east of the Kiln Lane substation (outside of land owned by the SPR parties'). This is a complicated cable crossing as the SPR parties do not know what stage of construction they will be at when NGET will be crossing the

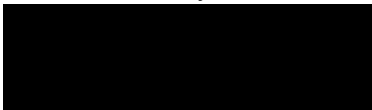
cables, EA2L may have laid their cable as well as the ducts for EA1NL with the EA1NL cable still to be installed. Alternatively the SPR parties and the Applicant might be looking to lay cables at this location at the same time. Therefore, the situation here is a lot more complicated than a standard cable crossing.

- 2.12 The SPR parties have now received comments on their proposed protective provisions from the Applicant. The protective provisions for SPR are in agreed form. Discussions are still ongoing in relation to the EA1NL and EA2L protective provisions. The SPR parties are confident that various agreements which will deal with these matters will be agreed between them and the Applicant; however this is unlikely to happen before the close of the Examination. It is therefore imperative that protective provisions for the SPR parties are included in the DCO should development consent be granted, to ensure the SPR parties are protected in the meantime.
- 2.13 The SPR parties agree to provide their final proposed wording for the protective provisions at Deadline 7 should agreement on these not be reached with the Applicant beforehand.

3. Response to ExQ3

- 3.1 The SPR parties' responses to relevant ExQ3 questions are provided in **Schedule 1** to this submission.

Yours faithfully



For and on behalf of Shepherd and Wedderburn LLP

SCHEDULE 1 – RESPONSES TO EXQ3

ExQ3	Question:	Response:
3ECOL4	<p>Ecological Management Plan Does SPR consider that all relevant ecological mitigation measures secured by its ecological management plan (as referenced in table 3.5, item 3.5.3 of the draft statement of common ground) have been addressed by the applicant. If not, explain what additional provisions it considers are necessary to be secured by the application and provide drafting.</p>	<p>An Ecological Management Plan (“EMP”) for the onshore substation area has been discharged under Requirement 21 of the EA1N and EA2 DCOs. A copy of the EMP has been issued to the Applicant. The Applicant and EA2L are currently in negotiation to transfer the implementation of the ecological management obligations (to the extent of the Applicant’s Kiln Lane substation) to the Applicant as part of a broader transfer of benefits and obligations under the EA2 DCO. Beyond the Kiln Lane substation, the joint development of a Coordinated Landscape Masterplan aims to ensure the connectivity of the areas of planting for biodiversity benefit would be maintained between the woodland, scrub and hedgerow implementation. Given these negotiations are progressing well, the SPR parties do not have specific concerns with the ecological management provisions currently proposed by the Applicant but reiterates their expectation that the Applicant will ensure that it doesn’t harm the ecologic mitigation that is implemented by EA2 and EA1N.</p>
3LVIA6	<p>Friston substation Provide confirmation that all of the landscape mitigation approved for the SPR East Anglia One North (EA1N) and East Anglia Two (EA2) consents would be secured and can be implemented for the proposed development. If there are differences explain what these are and how they affect the achievement of mitigation.</p> <p>Provide a detailed explanation and plan indicating whether the landscape mitigation referenced above can be accommodated within the order limits.</p>	<p>The SPR parties have been working with the Applicant regarding the Project (and National Grid Lion Link Limited (“LionLink”)) to review the landscape proposals recently approved as part of the discharge of requirements for EA1N and EA2. The aim has been to develop a Coordinated Landscape Masterplan to ensure that the impact of the Project (and LionLink) cable routes is minimised and the intended mitigation is maintained. The differences between the Coordinated Landscape Masterplan and the approved Onshore Substation Landscape Masterplan (February 2026) are primarily related to the species of vegetation that can be planted over the cables and how planting in these areas is phased. The SPR parties will work with the Applicant to ensure the local community is effectively engaged on the Coordinated Landscape Masterplan.</p>

APPENDIX 1 – COMPOSITE PLAN OF SPR PARTIES' INTERESTS (PROVIDED OVERLEAF)

Key:

- Land owned by SPRUKL / EA1N / EA2
- Land to be purchased by EA1N / EA2
- EA1N/2 Option not yet exercised (Option to Purchase Land)
- EA1N/2 Option not yet exercised (Option for Temporary Rights)
- Sea Link DCO Plots within SPR Land
- Other Sea Link DCO Plots outside SPR land

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

Interest:
N/A

Location:
Grove Road, Friston, Suffolk, IP17 1PT

Coords: 640901, 261371

Scheme Name:
East Anglia ONE North Project / East Anglia TWO Project

Drawing Name:
Information Plan

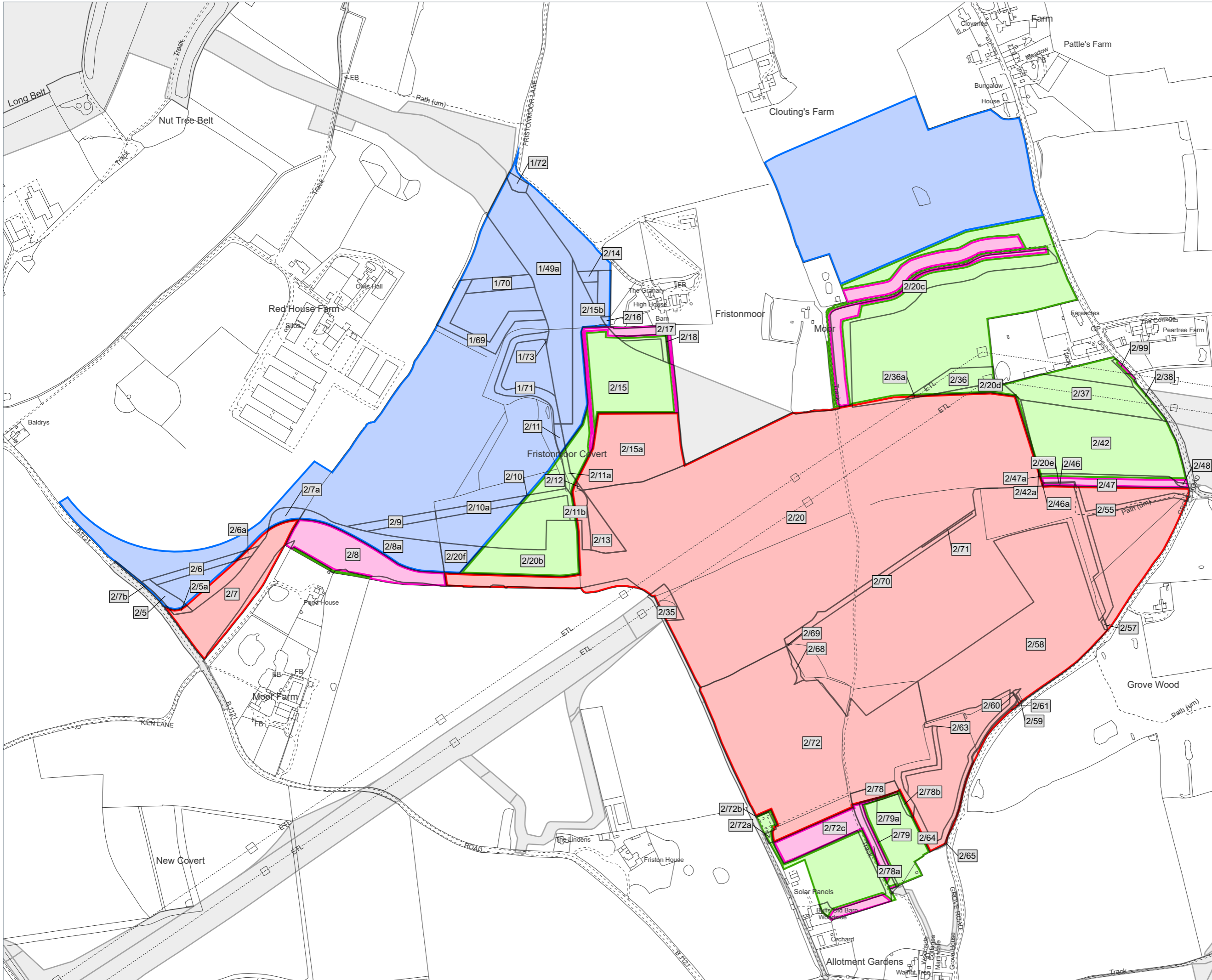
Drawing No: 180476_PLN_INFO_2869.1

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