

# Sea Link

## Volume 7: Other Documents

Document 7.4.3: Draft Statement of Common Ground Between National Grid Electricity Transmission and Historic England.

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# 1. Introduction

## 1.1 Overview

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application process for a Development Consent Order (DCO) and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.2 This SoCG is between National Grid Electricity Transmission Ltd (National Grid) and Historic England (HE) relating to the DCO application for the SEA Link Project (the Proposed Project). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).

## 1.2 Role of Historic England in the DCO Process

- 1.2.1 Historic England (HE) is an executive non-departmental public body and is sponsored by the Department of Culture, Media and Sport. Historic England was originally established under the National Heritage Act 1983 and operated from 1983 to 2015 under the name English Heritage. Due to the changes of the structure of Historic England, the body was renamed Historic England in 2015. HE is the government's statutory advisor and a statutory consultee on all aspects of the historic environment and historic assets.
- 1.2.2 Historic England's role in relation to the DCO process derives from the Planning Act 2008.
- 1.2.3 Historic England is a statutory body as prescribed under Section 42(1)(a) (duty to consult) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). Advice and consultation responses are typically provided as part of non-statutory consultation and engagement, in response to the Environmental Impact Assessment (EIA) Scoping Report 2, as part of statutory consultation (including on the Preliminary Environmental Information Report (PEIR) and participation in the Examination process.

## 1.3 Format of Document and Terminology

- 1.3.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.3.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved.
- 1.3.3 Abbreviations used within the SoCG are provided in Table 1.1 below.



**Table 1.1. Abbreviations**

<b>Abbreviation/Term</b>	<b>Definition</b>
DCO	Development Consent Order
DF	Design Freeze
dML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
HE	Historic England
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LiDAR	Light Detection and Ranging
OOWSI	Outline Onshore Overarching Written Scheme of Investigation
OWSI	Outline Offshore Overarching Written Scheme of Investigation
PEIR	Preliminary Environmental Information Report
PROW	Public Right of Way
SoCG	Statement of Common Ground
TJB	Transition Joint Bay
WSI	Written Scheme of Investigation

## 2. Record of Engagement

### 2.1 Summary of discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties.

**Table 2.1 Summary of discussions**

Date	Topic	Discussion points
5 May 2021	Historic England Introduction Meeting	Virtual introductory meeting to discuss the project. Overview of the project and the background, discussion of National Grid's approach to Developing Proposals and further details of the Sea Link project, including discussion of protected and chartered wrecks and Suffolk Heritage Coastline. Finished with AOB/questions.
31 January 2022	Sea Link Historic England Terrestrial Introduction Meeting	Virtual meeting to discuss project background and need case, introduction to Sea Link project, the approach to developing proposals, indicative timeline, work to date, Sea Link emerging preference and heritage assets, surveys, next steps and AOB/questions.
13 July 2022	Archaeology	Virtual meeting with Historic England to discuss the project. Overview provided by National Grid team, with some discussion regarding surveys Historic England would expect to see (i.e. geophysical survey, evaluation trenching, review of historic mapping, aerial photos, and LiDAR), as well as review of proposed Ground Investigation works.
28 July 2022	Sea Link Update – Historic England	Virtual meeting where details were presented of the converter station site options considered in Suffolk and examples of appearance and layouts for converters.
4 October 2022	Marine Archaeology	Virtual meeting with Historic England to discuss the loss of vibrocores recommended for Stage 2 geoarchaeological analysis and agreement for duplicates of those cores to be obtained and assessed during further geotechnical surveys planned in 2024.
1 December 2022	Archaeology and Marine Archaeology	Scoping Opinion response from Historic England submitted as part of the Planning Inspectorate's Scoping Opinion: Proposed Sea Link document.
20 January 2023	Archaeology and Built Heritage	Site meeting with Historic England and the Kent County Archaeologist to examine the Site/Scheme on the ground. Visit included the landfall, Ebbsfleet Lane, and Richborough Castle, and included discussions on potential physical impacts as well as impacts on setting.
21 - 23 February 2023	Archaeology and Built Heritage	Email correspondence with Historic England, as well as Kent County Council, to agree viewpoint photography for the Kent element of the Scheme.
4 May 2023	Sea Link Update – Historic England	Project update and timelines, outstanding actions, non-statutory consultation overview, scoping opinion response, design options, Kent site visit and AOB/questions where all discussed.

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
12 June 2023	Archaeology and Built Heritage	Email correspondence with Historic England to provide information on the work undertaken to date linked to potential setting impacts in advance of virtual meetings.
13 June 2023	Marine Archaeology	Virtual meeting with Historic England to discuss updates relevant to the offshore element of the Project. Summary of the known and potential marine archaeological resource presented. The rationale for the additional marine geophysical and geotechnical surveys was discussed, including confirmation that discarded cores recommended for Stage 2 geoarchaeological analysis will be obtained again as part of this survey.
15 June 2023	HE, Suffolk County Archaeologist and English Heritage Archaeology	Virtual Thematic Group Meeting with, Historic England, English Heritage and the Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on the proposed geophysical survey, with some discussions around potential setting impacts. Historic England to undertake site visit in Suffolk to examine assets where they feel there may be impacts on setting.
14 August 2023	Archaeology/Built Heritage	Email correspondence with Historic England and English Heritage to agree access to Richborough Castle to undertake site photography for setting assessment.
6 October 2023	Built Heritage	Virtual meeting with Historic England and East Suffolk Council to discuss the Project and the possible impacts on built heritage. This included discussions relating to ongoing agreement of locations of photomontages required for the heritage assessment.
27 November 2023	Built Heritage	Virtual meeting with Historic England and East Suffolk Council to discuss the Project and the possible impacts on built heritage. Main focus around agreement of locations of photomontages required for the heritage assessment. Meeting was followed by email correspondence with a list of proposed viewpoints supplied. These were agreed in January 2024.
8 December 2023	Archaeology	Virtual Thematic Group Meeting with. Historic England, English Heritage and the Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on results of the geophysical survey and proposals around archaeological evaluation trenching.
19 December 2023	Archaeology and Marine Archaeology	Historic England returned comments relating to the Preliminary Environmental Information Report (PEIR) and associated technical appendices relating to cultural heritage.
January to March 2024	Built Heritage	Email correspondence with Historic England and East Suffolk Council regarding built heritage and finalisation of viewpoint photography. Main discussions with East Suffolk Council, with Historic England agreeing approach and viewpoints by email on 15 March 2024.
13 March 2024	Archaeology	Virtual meeting between National Grid and Historic England teams covering both Kent and Suffolk. National Grid team provided an overview of project updates heading towards DF3.  Some high-level discussions relating to ongoing fieldwork and upcoming evaluation trenching.
27 March 2024	Marine Archaeology	Virtual Thematic Group Meeting with Historic England to discuss project updates (including fieldwork surveys), timeline and discussion of comments relating to the PEIR deliverables. Initial discussion relating to the Statement of Common Ground –

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
		<i>Historic England would prefer to review at the Environmental Statement stage but can provide comment prior to this if necessary. Historic England were also made aware of the Environmental Information Request regarding impact to Goodwin Sands.</i>
28 March 2024	Archaeology	<i>Virtual Thematic Group Meeting with Historic England and Suffolk County Archaeologist to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access.</i>
25 April 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access, with some discussion regarding problems relating to access.</i></p> <p><i>Stakeholders enquired as to whether the Sea Link Team had been able to engage with other projects such as Lion Link and Nautilus. Sea Link Team confirmed they were reaching out to other schemes.</i></p>
9 May 2024	Sea link update meeting	<i>Project update and timelines, statement of common ground – HE appreciates engagement and development of SoCG and happy to work with National Grid to bring approaches together.</i>
30 May 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access, with some discussion regarding issues relating to access.</i></p> <p><i>The Sea Link Team were also asked if they had any update on Wood Farm Listed Building, and its condition.</i></p>
27 June 2024	Archaeology	<i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access, and confirming the Study Area for Suffolk was sufficient (with Suffolk County Council). It was also noted that the Sea Link team were working with Lion Link to approach trenching of the Converter Station Site in a holistic way.</i>
25 July 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included noting that evaluation trenching had started in both Suffolk and Kent. It was also noted that access for viewpoint photography had been agreed for Suffolk.</i></p> <p><i>Stakeholders also asked if Sea Link were still engaging with other projects such as Lion Link, and Sea Link team confirmed they were.</i></p>
30 July 2024	Archaeology	<i>Email with Historic England to introduce them to the team undertaking the evaluation trenching and invite them to attend site visits. Historic England confirmed they would like to attend site visits and will agree dates/times as works progress. Email also enquired as to the best person to talk to at Historic England</i>



<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
		<i>regarding the scope of works to examine geo-archaeological remains in the Minster Marshes area.</i>
5 September 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in both Suffolk and Kent. It was also noted that viewpoint photography had been undertaken in Suffolk.</i></p> <p><i>Stakeholders also asked for confirmation that Sea Link were still engaging with other projects such as Lion Link, and Sea Link team confirmed they were.</i></p> <p><i>Historic England provided an update on Woodfarm, a Grade II listed building.</i></p>
25 September 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in both Suffolk and Kent. It was also noted that viewpoint photography had been undertaken in Suffolk.</i></p> <p><i>Historic England asked if they would be able to review the DCO before submission and AECOM confirmed they would ask if this would be possible due to the limited time in the programme.</i></p>
31 October 2024	Update	<i>Project update and timeline, Suffolk coordination and master planning, Kent coordination, AOB/questions.</i>
28 November 2024	Archaeology	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in Suffolk as well a brief overview of Kent.</i></p> <p><i>Gorse Hill was discussed, and it was noted that the results suggested the archaeological remains were of local/regional significance, and not national significance. It was also noted that no remains of national significance had been recorded in Suffolk to date, although some of the remains on the Ebbsfleet Peninsula in Kent were considered of national significance.</i></p> <p><i>Historic England asked if they would be able to review the DCO before submission and AECOM confirmed this would not be possible due to the limited time in the programme. Historic England also asked if it would be possible to review the 'DCO wording'. Historic England agreed to the scope of the geo-archaeological works in Kent.</i></p>
2 December 2024	Update (marine)	<i>Project update and timeline, marine survey updates (with confirmation of additional technical report to be submitted post DCO application), update on SoCG progress, AOB/questions.</i>
28 May 2025	SoCG	<i>Discussion on structure and process for developing an SoCG.</i>
19 June 2025	Update	<p><i>Discussed initial comments received on SoCG.</i></p> <p><i>Project provided an update on evaluation trenching in Kent and Suffolk. Agreed that since Wood Farm has been delisted it can be removed from the assessment.</i></p> <p><i>Project provided update on marine archaeology.</i></p>
24 July 2025	Friston henge	<i>Project update following Phase 2a and Phase 2b trial trenching evaluation in Suffolk and in particular, discussion around the</i>

Date	Topic	Discussion points
		<i>significance and mitigation of the possible neolithic henge near Friston.</i>
23 <sup>rd</sup> October 2025	Friston henge	<p><i>Project update following additional geophysical survey undertaken in the area of the possible neolithic henge near Friston.</i></p> <p><i>Results that demonstrate the feature is a D-shaped enclosure rather than a henge shared with HE and SCC. Both agreed the feature was clearly not a henge and that it was not considered of high value or of schedulable quality. As such, it was agreed that the asset no longer had to be avoid, and mitigation through excavation and recording would be suitable if the Suffolk Onshore Scheme resulted in physical impacts.</i></p> <p><i>It was also noted that any physical impacts on the asset would require the excavation of the full asset, and not just the section being impacted.</i></p>
7 November 2025	SoCG and RR update	<i>Provided a project update and discussed matters raised in HE's Relevant Representations including Suffolk archaeological evaluation and significance of archaeological assets, impacts on Richborough Forst and Ebbsfleet Peninsula, and provided update on OWSI and geoarchaeological works.</i>

### 3. Areas of Discussion Between the Parties

#### 3.1 Assessment Methodologies

**Table 3.1 – Assessment Methodologies**

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.1.1	Application Document 6.14 Environmental Scoping Report 2022 [APP-299]  Application Document 6.15 Scoping Opinion 2022 [APP-300]	Assessment methodology	HE agreed to the proposed EIA Methodology and the scope of the assessment as set out in Application Document 6.14 Environmental Scoping Report 2022 [APP-299].  The Applicant has provided extensive pre-application archaeological investigations, both onshore and offshore. This is to be commended. They have provided a robust assessment of the location, type and significance of designated and undesignated heritage assets. Heritage receptors have therefore been considered in the design of the scheme, and a robust approach to mitigation has been proposed.	The methodology and scope of the EIA has followed that set out in Application Document 6.14 Environmental Scoping Report 2022 [APP-299]), and takes account of HE's comments made in its response to the request for a scoping opinion (see Application Document 6.15 Scoping Opinion 2022 [APP-300]) as well as during pre-application engagement. .	Agreed

#### 3.2 Development Consent Order

**Table 3.2 - Development Consent Order**

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.2.1	Application Document 3.1 Draft Development Consent Order [AS-087]	Drafting of the DCO	In the event of the project being consented, HE would want to ensure that there is adequate mitigation, and that this is appropriately secured through the consent order.  HE will be providing comments and recommendations on the DCO wording, specifically Archaeology Requirement 14 (2) and the REAC and OWSI documents.	This Applicant will consider any proposed amendments to the wording of the DCO, including Requirement 14 (2), and any other control documents such as REAC [APP-342] and OWSIs [APP-343 and APP-344] once these are received.	Under discussion
3.2.2	Application Document 3.1 Draft Development Consent Order [AS-087]	Drafting of the DCO	Further consideration has been requested with regards to the design parameters for the Kent side Converter Station design, specifically how to ensure that historic environment issues are considered and	The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b> . Design	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
			that there is adequate consultation in the event of the DCO being granted.	Principles CO.2 in Table 3.1 of APP-367 sets out the need to design the Minster Converter Station in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b> is secured through Schedule 3 Requirements 6 of the DCO	
3.2.3	Application Document 3.1 Draft Development Consent Order [AS-087]	Drafting of the DCO	HE would like to explore whether further consultation with HE could be made conditional as part of the DCO and REAC documents, and how the design parameters can be secured to ensure the harm to the historic environment is minimised.	The Applicant will consider any further comments on the specific wording of the DCO in due course. The Applicant will consult further with HE to discuss feasible design mitigation options	Under discussion
3.2.4	Application Document 3.1 Draft Development Consent Order [AS-087]	Deemed marine licence (dML)	HE focus in the written representation will be on mitigation and to ensure that measures are appropriately secured through the DCO and dML.	The Applicant will consider any further comments on the specific wording of the DCO and dML in due course.	Under discussion

### 3.3 Offshore and Intertidal Archaeology and Cultural Heritage

**Table 3.3 – Offshore and Intertidal Archaeology and Cultural Heritage**

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.3.1	Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]	Offshore study area	Discussions are ongoing. The Consultee stated in November 2024 that all matters remain under discussion at this time.	The study area used within <b>Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]</b> reflects the Order Limits and is adequate to allow the baseline to be understood and potential impacts to be considered.	Under discussion
3.3.2	Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]	Baseline characterisations of the marine historic environment and data sources	Additional geotechnical work undertaken in October 2024 was still in progress at the time of submission and was not included within the documents submitted. HE has received the additional geoarchaeological reports [AS-033] and [AS034] and provided comments in a letter dated 1 October 2025..	The results of the additional geotechnical work undertaken in 2024 and updated deposit models are now available and are presented within <b>Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]</b> and <b>Application Document 9.2.1 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment - Technical Note (dated May 2025) [AS-034]</b> . Both documents were submitted to PINS on 12 June 2025 and provided to Historic England on 5 August 2025.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
				Comments on <b>Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]</b> were received from Historic England on 3 October 2025. An updated version of this document, addressing the comments received from Historic England will be submitted to PINS at Deadline 1.	
3.3.3	Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]	Impact assessment	HE has reviewed Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079] and notes that the chapter includes changes requested in HE previous comments at the PEIR stage (see HE advice dated 19th December 2023). This represents good progress towards addressing HE previous concerns and we will provide further detail on this in our written representation.	This is noted and the Applicant will consider any further comments on the assessment of marine archaeology as presented within <b>Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]</b> in due course. The Applicant will continue to engage with HE to understand and address any outstanding matters regarding the assessment of effects on marine archaeology.	Under discussion
3.3.4	Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI)	Marine archaeology mitigation	HE has reviewed Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI) and notes that the document includes changes requested in HE previous comments at the PEIR stage (see HE advice dated 19th December 2023). This represents good progress towards addressing HE previous concerns and we will provide further detail on this in our written representation.	This is noted and the Applicant will consider any further comments on <b>Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI)</b> including those provided within written representations, in due course,. The Applicant will continue to engage with HE to understand and address any outstanding matters regarding the proposed mitigation for marine archaeology effects.	Under discussion

**Table 3-4 Onshore Archaeology and Cultural Heritage**

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.4.1	<b>6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]</b>  Application Document 6.3.3.3.F - Appendix 3.3.F: Archaeological Evaluation	Scope of archaeological evaluation (Suffolk and Kent)	HE commented that the draft trenching plans look well targeted and have confirmed that they are supportive if the County Archaeologists are. HE will wait for any updates from the trial trenching before any final decisions are made; however, the Consultee has agreed to the scope of the geophysical survey and trial trenching as set out on <b>Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]</b> and <b>Application Document 6.3.3.3.F - Appendix 3.3.F: Archaeological Evaluation Trenching Report (Draft) [app-166]</b>	<p>Trial trenching included a mix of trenches targeted on possible archaeological features recorded through non-intrusive surveys (i.e. geophysical survey) as well as testing of blank areas.</p> <p>The scope of the evaluation trenching and geophysical surveys in Kent and Suffolk was agreed with Kent County Council and Suffolk County Council with both organisations agreeing trench locations, the percentage of trenching required, and approving the Written Schemes of Investigation.</p> <p>Evaluation trenching in Kent was undertaken in a single phase with reporting been submitted as part of the DCO Application (<b>Application Document 6.3.3.3.F – Appendix 3.3.F: Archaeological Evaluation Trenching Report (Draft) [APP-166]</b>).</p> <p>The results of the Phase 1 archaeological evaluation trenching in Suffolk are provided in <b>Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]</b>, with the data</p>	Agreed



Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
	Trenching Report (Draft) [APP-166]			<p>summarised in <b>Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]</b>, and potential impacts assessed in Section 3.9 of <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</b>.</p> <p>The interim results of the Phase 2a evaluation trenching in Suffolk are also included in Section 3.9 of <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</b>.</p> <p>Phase 2b evaluation trenching was undertaken after submission of the application. The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with HE in July 2025 and submitted to PINS on 16 September 2025 (refer to <b>Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]</b> and <b>Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]</b>).</p> <p>Additional cultural heritage impact assessment based on the full and final results of the Phase 2a and Phase 2b trial trench evaluation in Suffolk has been undertaken by the Applicant and will be submitted in due course during Examination. The results of the Phase 2b trial trenching revealed a potential neolithic hengiform monument along the location of the HVDC cable route and access track. The Applicant has undertaken additional geophysical surveys of these areas and is in discussion with HE and Suffolk County Council Archaeological Advisor with regards to the nature and significance of the assets, and appropriate mitigation. The Applicant has submitted a Change Notification for the Proposed Project which includes an amendment of the Order Limits at this location to allow the re-routing of the cable and access track to avoid the location of this heritage asset if required.</p>	
3.4.2	<b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</b>  <b>Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262]</b>	Photomontages (Suffolk and Kent)	<p>HE requested viewpoints to be turned into photomontages and undertake a heritage specific approach to views assessment.</p> <p>HE will review the photomontages and comment on these in due course.</p>	<p>Photomontages from agreed heritage viewpoint locations have been provided in <b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</b> and <b>Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262]</b>.</p> <p>Additional illustrative visualisations are being submitted at Deadline 1 in <b>Application Document 9.14 Suffolk and Kent Illustrative Visualisations</b>.</p>	Agreed
3.4.3	<b>Application Document 6.3.2.3.F Appendix 2.3.F Phase 1 Archaeological</b>	Suffolk Onshore Scheme – Archaeological evaluation	The lack of completed archaeological evaluation has limited a full understanding of the baseline information and the significance of the archaeological assets which may be affected by the proposals.	Available land within the Suffolk Order Limits, where there is the potential for physical impacts, was assessed through evaluation trenching. The results of this are detailed in <b>Application Document 6.3.2.3.F Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]</b> for Suffolk.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
	<b>Trial Trenching Report (Draft) [APP-114]</b>		However, HE acknowledges that the trial trenching will be on-going and agree to review the supplementary report once available post the submission of the DCO application.	<p>The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with Historic England in July 2025 and to PINS on 16 September 2025 (refer to <b>Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]</b> and <b>Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]</b>). Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk will be submitted in due course during Examination.</p> <p>In the case that additional trial trenching information becomes available during examination (e.g. Phase 3 trenching in Suffolk associated with the enclosure to the east of Friston) the findings will be shared with HE and, if required, the assessment will be updated accordingly.</p> <p>Areas not available for trenching during pre and examination phases will be subject to further intrusive trial trenching as set out in <b>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]</b> which will be secured in the DCO by Schedule 3 Requirement 14 . The OWSI will be updated in agreement with the Archaeological Advisor to the LPA from SCCAS and will be shared with Historic England. The updated OWSI will be submitted during the Examination.</p>	
3.4.4	<b>Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]</b>	Suffolk Onshore Scheme - prehistoric henge	<p>Phase 2b evaluation trenching in Suffolk identified a possible prehistoric henge. HE initially advised the Applicant that avoidance would be the right choice of mitigation as the remains were originally considered to be of schedulable quality.</p> <p>Following additional geophysical survey and confirmation that the asset is actually a D-shaped enclosure rather than a henge, HE has confirmed that the asset is no longer considered to be of schedulable quality.</p>	<p>The results of Phase 2a and 2b evaluation trenching in Suffolk have been shared with Historic England in July 2025 and an updated impact assessment based on the final results will be submitted in due course during Examination. The Phase 2b work identified a possible prehistoric henge feature near Friston which was considered by Historic England to be of national significance and of schedulable quality, subject to further investigation. As such, HE initial advise was that mitigation through design would be deemed the most appropriate mitigation, with the asset avoided.</p> <p>Additional geophysical survey has since confirmed that the asset is a D-shaped enclosure rather than a henge, and as such it is not considered to be of schedulable quality. Further consultation with SCC Archaeological Advisor and HE noted that the asset no longer had to be avoid, and mitigation through excavation and recording would be suitable if the Suffolk Onshore Scheme resulted in physical impacts. If the Suffolk Onshore Scheme would result in physical impacts to the asset, the complete extent of the asset would need to be subject to archaeological excavation,. Additional evaluation trenching (Phase 3 Suffolk) is being undertaken to inform the most appropriate mitigation strategy for this asset. Results of this Phase 3 trial trenching will be shared with HE and SCC Archaeological Advisor in due course.</p> <p>As set out in <b>Application Document 9.19 Sea Link DCO notification of change to DCO application [APP-138]</b>, the Applicant is seeking to amend the Order Limits around Friston to allow enough flexibility to accommodate appropriate mitigation measures, following further investigation</p>	Agreed

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3.4.5	<p><b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b></p> <p><b>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]</b></p>	Suffolk Onshore Scheme - Cultural Heritage mitigation	<p>HE notes that a location specific Outline Written Scheme of Investigation (WSI) have been prepared for the Suffolk Onshore Scheme in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures.</p> <p>HE welcomes commitment to archaeological mitigation. HE notes however that the document had not been previously shared with them. HE will therefore provide further comments on this in their Written Representation. Amendments and further drafting may therefore be required.</p>	<p>Geophysical surveys and information from evaluation trial trenching has been used to inform the design of the Suffolk Onshore Scheme so that the most sensitive areas are avoided, while construction methods have been adapted to avoid impacts in other areas.</p> <p>Mitigation where impacts cannot be avoided is being developed with HE and Archaeological Advisor at SCC with details provided in <b>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]</b>.</p> <p>The Applicant is in the process of updating Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] in line with comments received during further consultation with SCC Archaeological Advisors and will issue updated versions in due course during Examination. The Applicant will engage further with HE to consider their feedback in the updated OWSI.</p>	Under discussion
3.4.6	<b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-093]</b>	Kent Onshore Scheme - Richborough Roman Fort	<p>HE consider that there is a higher level of harm to Richborough Roman Fort than has been described by the Applicant. This is because the setting of the fort contributes more to the significance and towards the understanding of the monument than is set out in the application. The visualisations provided demonstrate that the converter station will intrude into views from the amphitheatre towards the fort and in and around the fort itself.</p>	<p>The effect of the Proposed Project on the setting of Richborough Roman Fort is assessed in Section 3.9 of <b>Application Document 6.2.3.3 Part 3 Chapter 3 Cultural Heritage [APP-063]</b>. The assessment concluded that the magnitude of impact would be negligible. This was based on the distance between the asset and the proposed Minster Converter Station and Substation, the presence of other modern development that is closer to the asset, and the fact that the Wantsum Channel, which forms a component of the asset's setting, has altered significantly as a result of silting and land reclamation, changes that have considerably altered the setting of the monument. This is demonstrated in the illustrative visualisations for Kent, and specifically the illustrative visualisation produced from VP 8 – Richborough Fort Viewing Platform, see <b>Application Document 9.14 Supplementary Environmental Information Report – Suffolk and Kent Illustrative Visualisations</b>.</p> <p>Furthermore, the proposed Minster Converter Station and Substation would be located on the northern side of the former Wantsum Channel, and as such would not alter the ability to understand the original setting of Richborough Fort as a shore fort overlooking the channel nor would it sever any intervisibility that may have existed between Richborough Fort and the Ebbsfleet Lane complex on the north side of the Wantsum Channel. A negligible magnitude of impact on an asset of high value would result in a minor adverse effect (considered 'not significant' in EIA terms). The level of harm to the designated asset is assessed in Section 7.5 (paragraphs 7.5.35 to 39) of <b>Application Document 7.1 Planning Statement [APP-319]</b>, <b>superseded by [AS-057]</b>, to amount to less than substantial harm at the lower end of the spectrum.</p>	Under discussion
			HE acknowledges that some steps have been taken in regard to this application to	The design of the Minster Converter Station and Substation is being developed in consultation with stakeholders and in line with design	Under discussion

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			reduce the potential for harm to the historic environment, for example, siting the converter station in as are of topography which helps to shield it naturally from view, as well as ensuring that the roofline does not break the horizon when viewed from the fort. In order to ensure harm to the significance of Richborough Roman Fort is truly minimised, however, the final design of the converter station complex needs to be better considered within the design parameters set out in the application.	parameters as set out in <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b> . Design Principles CO.2 and S.2 within Table 3.1 and 4.1 of <b>APP-367</b> respectively, set out the need to design the Minster Converter Station and Substation in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Design Principle CO.3 (Table 3.1) also identifies LVIA VP08 (Richborough Roman Fort) as a strategic view to assess the performance of the design of the converter station in different lighting conditions with a particular focus on how the sheen on cladding materials can affect appearance. Compliance with key design principles set out in Table 3.1 of <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b> is secured through Schedule 3 Requirements 6 of the DCO, whilst design principles set out in Table 4.1 are secured through measure GG36 in the REAC <b>[APP-342]</b> which in turn is secured by DCO Schedule 3 Requirement 6	
			<p>Some of the design responses put forward at this stage (see Section 6 Doc 7.11.2 Design Approach Document- Kent) are likely to be more intrusive within the landscape and therefore would have correspondingly higher level of harm. There does not appear to be a secure route by which Historic England can provide comment on the design moving forward, and mitigation against the historic harm needs to be appropriate.</p> <p>HE have some concern surrounding the design commitments in the REAC (LV17) and the Draft DCO Schedule 3 Requirement (3 Converter Station Design) as drafted, as they make no explicit provision for stakeholder engagement on this issue beyond the County Council.</p> <p>HE will provide further comment on this process in our written representation and recommend that the ExA seek further reassurances and a commitment from the Applicant to ensure that a design is chosen which reduces as far as possible harm to the significance of these heritage assets. HE would also want to ensure that they are specifically included as consultees in this process and that reducing harm, to heritage assets is a consideration in the design parameters</p>	<p>This is noted and the Applicant will consider any further comments on the specific wording of the DCO in due course. The Applicant will consult further with HE to discuss feasible design mitigation options.</p> <p>The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b>. Design Principles CO.2 in Table 3.1 of APP-367 sets out the need to design the Minster Converter Station in response to LVIA <u>and Heritage key views</u> to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of <b>Application Document 7.12.2 Design Principles – Kent [APP- 367]</b> is secured through Schedule 3 Requirements 6 of the DCO.</p>	Under discussion
3.4.7	<b>Application Document 6.2.3.3 Part 3</b>	Kent Onshore Scheme - Ebbsfleet Peninsula	HE is pleased that the Applicant has undertaken extensive archaeological evaluations during the pre-application	The Applicant acknowledges that mitigation through a programme of archaeological investigation does not reduce the magnitude of impact. The reduction in the significance of effect recognises that professional excavation	Under discussion



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	Kent Chapter 3 Cultural Heritage		<p>period. The results of this work have been well accounted for in the design and the risk of large impacts on the most sensitive areas of the Ebbsfleet Peninsula Complex has been largely avoided.</p> <p>However, HE agrees with the ES that the development is still likely to result in some harm to the Ebbsfleet Peninsula Complex. This will result in a permanent residual change and a significant effect in EIA terms to an undesignated, but potentially nationally significant, heritage asset.</p> <p>HE disagrees that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to 'Minor' (Table 3.12, pg 60, Doc 6.2.3.3, Environmental Statement, Part 3 Kent, Chapter 3 Cultural Heritage) as the harm here is only somewhat offset and not truly lessened by the ability to record remains prior to their removal.</p> <p>This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.</p> <p>HE therefore recommend options are considered by the applicant to further reduce the heritage harm. We consider this could be achieved by removing site compounds and through using no-dig options.</p>	<p>and recording of archaeological remains is a compensation measure, the successful completion of which would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.</p> <p>The Applicant will consult further with HE and KCC to discuss feasible design mitigation options. Site compounds are an important element of the construction process allowing space for staff welfare facilities and the lay down and storage of plant and materials. The Applicant has looked to relocate compounds away from areas highlighted as of increased value where possible however is unable to remove the compounds completely and still complete the works. A number of separate compounds have been proposed to enable the various elements of the works to be controlled safely and effectively, this involves three principal compounds adjacent to the Converter and Substation site, these are for the Converter Contractor, the Cable Contractor and the OHL Contractor. Segregation of these compounds is best practice from a Construction Design and Management perspective; the location of these main compounds has been chosen to reduce impacts on the archaeology of the area. The compounds either side of the A256 are necessary to enable the trenchless crossing of the road, with the western compound also acting as an enabling compound for the Converter contractor to allow for the access and main compounds to be constructed. The Applicant will work with its contractors to look to reduce the footprint of compounds where practicable during the detailed design process. The no dig option of installing compounds above top-soil without undertaking a top-soil strip has been considered. This option would however impact the quality of the top-soil which would then require remedial works to return it to its original condition. The Applicant considers that the remedial works would be just as impactful as the top-soil strip so would not provide a betterment.</p>	
3.4.8	Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [APP-345]	Kent Onshore Scheme - Cultural Heritage mitigation	<p>HE notes that a location specific Outline Written Scheme of Investigation (WSI) have been prepared for the Kent Onshore Scheme in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures.</p> <p>HE welcomes commitment to archaeological mitigation. HE notes however that the document had not been previously shared with them. HE will therefore provide further comments on this in their Written Representation.</p>	<p>Geophysical surveys pointed to high archaeological potential areas adjacent to Richborough Way (Thanet) on the Ebbsfleet Peninsula, and trenching confirmed the presence of a complex multi-period site. The data was used to design the Kent Onshore Scheme so that some of the most sensitive areas were avoided, while construction methods have been adapted to avoid impacts in other areas.</p> <p>Mitigation where impacts cannot be avoided is being developed with HE and Archaeological Advisor at KCC with details provided in <b>Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [APP-345]</b>.</p> <p>The Applicant is in the process of updating <b>Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [APP-345]</b> in line with comments received during further consultation</p>	Under discussion



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			Amendments and further drafting may therefore be required.	with KCC Archaeological Advisors and will issue updated versions in due course during Examination. The Applicant will engage further with HE to consider their feedback in the updated OWSI.	
3.4.9	<b>Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167].</b>	Kent Onshore Scheme - geoarchaeological information	<p>HE notes that a full study is proposed with further coring to supplement evidence from test pits and trial trenches. Preliminary information was obtained through Ground Investigation works but this has not been archaeologically assessed. The Ground Investigation data provides valuable baseline information towards characterisation and understanding of the archaeological potential of an area, and it is a shame these opportunities were not taken to generate the archaeological information that is needed.</p> <p>This will need to be provided, and we recommend the ExA seek and understating from the applicant as to the likely delivery and format of the documents.</p> <p>Also outstanding is an understanding of effects that changes to ground water levels and flows might have on buried archaeological and palaeoecologist assess. A detailed geoarchaeological study will help in that respect.</p>	<p>The Applicant notes that the GI works undertaken to date utilised techniques that would not have enabled geo-archaeological data to be collected. A geo-archaeological desk-based assessment of the Kent Onshore Scheme was therefore undertaken to inform the assessment; this is presented as <b>Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]</b>. This was based on a scope agreed with KCC and HE and included a review of the data collected as part of the GI works as well as data from nearby projects, including the Richborough to Canterbury Connection.</p> <p>The Applicant continues to engage with KCC and HE to develop a scope of works to enable geo-archaeological works to be accommodated during the further GI works which are being undertaken in late 2025/early 2026. This additional assessment will be secured in the Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent [APP-344, which is currently being updated, and which will be submitted at the relevant deadline during Examination.</p> <p>Changes to water levels and flows and the potential impacts of these on heritage assets will be addressed as part of the geo-archaeological assessment work to be undertaken in conjunction with the next phase of GI works.</p>	Under discussion

# 4. Approvals

Signed	
On Behalf of	National Grid
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

Signed	
On Behalf of	Historic England
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

## 5. References

Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

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