

# Sea Link

## Volume 9: Examinations Submissions

Document 9.46 Draft Statement of Common Ground Between National Grid Electricity Transmission and Anglian Water.

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# 1. Introduction

## 1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and 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.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

## 1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared between the Applicant and Anglian Water Service Limited (Anglian Water). 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).
- 1.1.1 Updates to the SoCG are taking place following comments from Anglian Water and a further meeting held on the 14 November 2024. A further copy of the SoCG will be issued at a later deadline.
- 1.1.2 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and Anglian Water and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.
- 1.1.3 For the purpose of this SoCG, National Grid and Anglian Water will jointly be referred to as the “Parties”. When referencing the Anglian Water alone, they will be referred to as “the Consultee”.

## 1.2 Role of Anglian Water in the DCO process

- 1.2.1 Anglian Water are the statutory undertaker for water supply, sewerage, and sewage treatment in the east of England by virtue of an appointment made under the Water Industries Act 1991. Their role during the DCO process derives from being a statutory consultee; as a prescribed consultee of the Planning Act 2008. The consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between Anglian Water and National Grid.

- 1.2.2 Anglian Water has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the proposed project and Anglian Water has existing assets within the Proposed Project's Order Limits.

## 1.3 Description of the Proposed Project

- 1.3.1 The Proposed Project is a proposal by National Grid to reinforce the transmission network in the Southeast and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.3.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.
- 1.3.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.
- 1.3.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:
- 1.3.5 Schedule 9(1)(a) '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;*' and
- 1.3.6 Schedule 9(1)(b) '*...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'.
- 1.3.7 The Proposed Project would comprise the following elements:

### The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.

- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

## The Offshore Scheme

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

## The Kent Onshore Scheme

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.
- The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations

## 1.4 Format of Document and Terminology

- 1.4.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.4.2 Section 3 of this SoCG summarises the issues that are ‘agreed’, ‘not agreed’, ‘not agreed but not material’, 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. ‘Not agreed but not material’ indicates that although the parties have not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed.

1.4.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

**Table 1.1 Abbreviations**

Abbreviation/Term	Definition
DCO	Development Consent Order
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
SPR	Scottish Power Renewables
TJB	Transition Joint Bay

## 2. Record of Engagement

### 2.1 Summary of discussions

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

**Table 2.1 Record of meetings and correspondence with Anglian Water**

Date	Topic	Discussion points
03/08/2022	Initial consultation email	Initial consultation email sent to Anglian Water. The email included a summary document which comprised indicative scheme drawings, to help provide some context for the scheme, details of the proposal, and impact on Anglian Water's assets.
21/09/2022	Initial consultation meeting	Introductory MS Teams meeting with the proposed project's engineering and communications teams with Anglian Water. The meeting was to share information regarding the proposed project including indicative timeframes for planning submission and construction.
Oct – Dec 2022	Non-statutory Consultation	A period of non-statutory consultation was held between, the 24th of October 2022 and December 2022. The consultation introduced the proposed project and its background through documentation including a corridor and preliminary routing and siting study.
05/12/2023	Update meeting	MS Teams meeting between engineering team of the proposed project and Anglian Water to provide updates on progress and timeframes for planning submission and construction.
Oct – Dec 2023	Statutory Consultation	Statutory public consultation occurred from 24 October to Monday 18 December 2023. The statutory public consultation provided details of the proposed project, along with supporting environmental information, and an update on how the proposals have developed since the last consultation in 2022.
22/05/2024	Post Statutory Consultation update	Consultation presentation to Anglian Water, from the consenting and engineering team of the proposed project. Points of discussion included a proposed project update, statutory consultation, and the river Fromus crossing.
26/06/2024	Update meeting	Consultation design interface presentation to Anglian Water from the consenting and engineering teams of the proposed project.

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
July 2024	Targeted Consultation	Proposal update since the close of statutory consultation in December 2023, and further technical and environmental assessments. As a result of this work, changes to the plans were shared.
29/07/2024	Update meeting	Consultation MS teams meeting held between the proposed project's engineering and consenting teams with Anglian Water. Comments provided within meeting to inform Memorandum of Understanding update.
07/11/2024	MoU issue	Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0461 P03) issued to Anglian Water for comment.
09/01/2025	Design interface document issue	Updated design interface document (SEAL-MMD-SEAL-ENG-TCN-0760) issued to Anglian Water for comment.
10/01/2025	Call Update regarding consultation	Anglian Water contacted the proposed project engineering team confirming receipt of information and stating that Anglian Water will now be introducing a charge for consultation services
04/03/2025	Design interface document response update	<p>Anglian Water contacted the proposed project engineering team to state that they are identifying resources to review the updated design interface provided.</p> <p>Anglian Water also requested an updated update on the inclusion of our Protective Provisions in the draft DCO as set out in our PP template</p>
11/03/2025	High-level clash detection summary	Anglian Water produced a high-level clash detection summary that provided information on some of their primary concerns regarding the interfaces. That asked that these be addressed appropriately in the draft DCO and Environmental Statement.
25/03/2025	Response to high-level clash detection summary	The proposed project's engineering team reviewed the high-level clash detection summary provided by Anglian Water and added comments to any areas of concern. Anglian Water to follow up if they had any further comments at this stage,
26/03/2025	Protective provision update	The proposed project's consenting team provided an updated to Anglian Water stating that proposed project's legal team has reviewed your proposed draft protective provisions and there are some points which are being checked within the business, however the proposed

Date	Topic	Discussion points
		<i>project hopes to provide an updated position soon. Additionally, that the DCO will reflect discussion to date and that the project can update the Examining authority at the start of the examination, including confirming the position on any agreed protective provisions.</i>
27/03/2025	<i>Protective provision update response</i>	<p><i>Anglian Water stated that they were grateful for the update on the protective provisions.</i></p> <p><i>Additionally, Anglian Water asked for the response to the high-level clash detection to be re-sent.</i></p> <p><i>The information was re-shared in separate email correspondence on the 28/03/2025.</i></p>
25/09/2025	<i>Email follow-up in respect to the relevant representation response received</i>	<i>Email to Anglian Water in response to their relative representation as part of the project's DCO pre-examination. Within the Anglian Water relative representation, further discussion is requested to confirm aspects such as, trenchless crossings, ducting, open cut locations, access works, likely diversions, and any above ground plant. This email was sent to arrange a meeting to further discuss the Proposed Project's interaction with Anglian Water's assets. The interface document used to support these discussions was redistributed.</i>
14/11/2025	<i>Meeting with Anglian Water</i>	<i>Non-technical discussion on the interfaces and points raised in Section 3. Agreement in principle made on all points pending further design and additional technical review from Anglian Water.</i>

## 3. Areas of Discussion Between the Parties

### 3.1 The Proposed Project and Anglian Water Existing Assets

Four Interfaces identified between Sea Link works and Anglian Water assets

**Table 3.1 The Proposed Project and Anglian Water Existing Assets**

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
3.1.1	N/A	S/UT/FW/0010 – Foul Water Rising Main 225mm (HPPE / PE100)	The Consultee agreed to the NGET position in principle.	Minimum 1.5 m clearance required for all Anglian Water Assets, subject to detailed design assessment of cable isotherms and heave action of HDD. Landfall drills will be at depth and monitored throughout drilling process. Measures (and assessment where necessary) to be applied for cathodic protection and protection against heave.	Agreed
3.1.2	N/A	S/UT/W/0011 – Final Effluent 225mm (HPPE/PE 100)			
3.1.3	N/A	S/UT/FW/0069 – Gravity Foul Sewer 375mm AC.	Concern regarding damage to pipe during construction and restricted safe access to pipe in future. Anglian Water's Protective Provisions require a buffer of 5 metres each side of the medial line for pipes	Only preliminary design for the river crossing complete at this stage. Subsequent design stages should consider concerns around the access to the foul sewer and impact of the construction activities. However, there is a staged approach to this crossing; the different scenarios are explained below:	Agreed in principle - Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
		<p>where the diameter is between 250mm and 400mm. The distance of 2 metres of the bridge abutments is considered insufficient when taking account of suitable working areas. The sewer transfers the wastewater flows from Saxmundham via Sternfield-Benhall Bridge pumping station, to the Benhall water recycling centre to the south. Appropriate mitigation measures are required to avoid damage to the pipe and pollution risk.</p> <p>It is agreed that the Order Limits are sufficient to accommodate any diversion of this asset.</p> <p>(Within the meeting held on 14/11/2025, Anglian water agreed in principle to the scenario based approach pending detailed</p>	<p>Scenario 1: Gravity Foul Sewer closer than 2 m from abutment works.</p> <p>Review of potential loading during construction and operation, ducting or diversion depending on loading assessment.</p> <p>Scenario 2: Gravity Foul Sewer between 2 m and 5 m from abutment works.</p> <p>Asset to be ducted with a 'no lay down area' defined and no construction movements over asset.</p> <p>Scenario 3: Gravity Foul Sewer greater than 5 m away from abutment works.</p> <p>Asset left alone with a 'no lay down area' defined and no construction movements over asset.</p>		

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
			design and further technical review)		
3.1.4	N/A	S/UT/FW0094 – Gravity Foul Sewer	Sufficient horizontal & vertical clearance from sewer required to enable safe future access to AW asset. Minimum distance is to be confirmed.	<p>Depth of outfall not designed at the current stage. Ideally, the outfall would not cross the sewer but run parallel to it with the applied clearance.</p> <p>The Proposed Project is to confirm proposed depth of outfall pipe versus Anglian Water's pipe and if the outfall pipe crosses the sewer with clearance applied. The proposed project's outfall is to an ordinary watercourse not a public sewer.</p>	Agreed in principle - Under discussion

## 3.2 Construction matters

**Table 3-2 Construction matters**

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
3.2.1	N/A	Locating the assets	Anglian Water do not have details on the depths of their assets therefore investigations	All assets to be identified through trial holes with watching briefs. Note early notification to arrange	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
			by National Grid and their Contractors will be required to ascertain depth. Geophysical surveys are often used to identify Anglian Water Assets, and these have been undertaken where access allows. Trial holes over assets are also likely to be required to confirm depths prior to detailed design.	watching briefs is required minimum 6 weeks	
3.2.2	N/A	Asset crossing	Anglian Water would prefer that the cables pass underneath their assets in all cases.	Only two interfaces between assets and Sea Link cable. Both of which will cross using trenchless drilling and, therefore, will be underneath with a minimum 1.5m clearance subject to detailed design assessment of cable isotherms and heave action of HDD.	Agreed
3.2.3	N/A	Additional loading due to the haul road/construction vehicles.	Required that there is no extra loading on the assets due to the addition of the haul road.	National Grid and/or their contractor will be required to provide calculations whether mitigation/protection is required. Any mitigation works will be the responsibility of National Grid to ensure that Anglian Water's assets are not damaged.	Agreed in principle - Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	The Applicant Current Position	Status
				Interface S/UT/FW/0069 at the River Fromus is the only haul road interface. The proposed bridge crossing over River Fromus includes a 24m span with an abutment on each bank. Exact location of gravity foul sewer is unknown. Refer to 3.1.4	
3.2.4	N/A	Electronic interference	Need to understand the electrical interference and heat dispersion that the electrical cables will have on their assets. This could impact on the distance required between the HDD cable depth and AW sewer assets.	Cable supplier currently unknown, Electrical interference to be confirmed at a later design stage	Agreed in principle - Under discussion

### 3.3 Proposed projects by Anglian Water

**Table 3.3 Proposed projects by Anglian Water**

Ref	Relevant Application Document	Summary of Description of Matter	Anglian Water Current Position	NGET Current Position	Status
3.3.1	N/A	New assets being installed	Currently no upcoming works that may interact with Sea Link works.	Any further updates to be provided by Anglian Water.	Agreed

# 4. Approvals

Signed	
On Behalf of	Anglian Water
Name	
Position	
Date	

Signed	
On Behalf of	National Grid
Name	
Position	
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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