

# Sea Link

## Volume 9: Examination Submissions

Document 9.51: Draft Statement of Common Ground Between National Grid Electricity Transmission and Cadent Gas

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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 is between the Applicant and Cadent Gas Limited (‘Cadent Gas’). 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).
- 1.2.2 The SoCG was sent to Cadent Gas on the 11 October 2024, and they are currently reviewing the document. The points agreed in Table 3.1 have been agreed in meetings prior to the SoCG being drafted.
- 1.2.3 This SoCG will be progressed during the Examination periods to reach a final position between the Applicant and Cadent Gas 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.
- 1.2.4 For the purpose of this SoCG, National Grid and Cadent Gas will jointly be referred to as the “Parties”. When referencing Cadent Gas alone, they will be referred to as “the Consultee”.

## 1.3 Role of Cadent Gas in the DCO process

- 1.3.1 The Consultee is a Statutory Undertaker under the Gas Act 1986. The Consultee holds a gas transporter licence, for the relevant area, regulated by the Office of Gas and Electricity Markets (Ofgem).
- 1.3.2 The Applicant has consulted with the Consultee in its capacity as a prescribed consultee for the purposes of the Proposed Project. The Consultee should provide



guidance and comments on the Sea Link proposal and co-own the SoCG between Cadent Gas and the Applicant.

- 1.3.3 Cadent Gas has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the Proposed Project and Cadent Gas has existing assets within the Proposed Project's Order Limits. These assets are identified as MP and LP mains.

## 1.4 Description of the Proposed Project

- 1.4.1 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.
- 1.4.2 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.
- 1.4.3 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.
- 1.4.4 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:
- 1.4.5 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
- 1.4.6 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*'.
- 1.4.7 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.

1.4.8 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.

## 1.5 Format of Document and Terminology.

1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.

1.5.2 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.

1.5.3 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
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 summarises the consultation and engagement that has taken place between the Parties.

**Table 2.1 Record of meetings and correspondence with Cadent Gas**

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
03/08/2022	<i>Initial consultation email</i>	<i>Initial consultation email sent to Cadent Gas. 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 their assets.</i>
Oct – Dec 2022	<i>Non-statutory Consultation</i>	<i>A period of non-statutory consultation was held for between, the 24 of October 2022 to 18 December 2022. The consultation introduced the proposed project and its background through documentation including a corridor and preliminary routing and siting study.</i>
07/11/2022	<i>Follow up email</i>	<i>Follow up email sent to Cadent Gas</i>
Oct – Dec 2023	<i>Statutory Consultation</i>	<i>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.</i>
July 2024	<i>Targeted Consultation</i>	<i>Proposals 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.</i>
02/10/2024	<i>Consultation meeting</i>	<i>Consultation meeting between Cadent Gas and the proposed project engineering and consents teams. Subsequent design information for given to Cadent Gas for review.</i>
07/01/2025	<i>Protective provision email</i>	<i>Email sent to Cadent Gas to schedule a follow-up meeting regarding protective provisions</i>
06/02/2025	<i>Proposed project updated Email</i>	<i>Latest proposals information shared with Cadent gas. A design interface document (SEAL-MMD-SEAL-ENG-TCN-0764) and memorandum of understanding (SEAL-MMD-SEAL-ENG-REP-0737) were shared for comment.</i>

## 3. Areas of Discussion Between the Parties

### 3.1 The Proposed Project and Cadent Gas Interfaces

**Table 3.1 The Proposed Project and Cadent Gas Interfaces**

Ref	Relevant Application Document	Summary of Description of Matter	Cadent Gas current Position	The Applicant Current Position	Status
3.1.1	N/A	Actions prior to construction	Trial pits required to identify depth of asset prior to works on site. Ground cover above our pipelines should not be reduced or increased.	Agree with Cadent Gas position.	Agreed
3.1.2	N/A	Asset Interface - trenchless cable installation interface with MP Mains	Cathodic protection and heave protection to be part of protective measures for trenchless crossings. Trenchless crossings to cross under MP mains with a minimum clearance of 1 m.	Agree with Cadent Gas position.	Agreed
3.1.3	N/A	Asset Interface - Crossing of LP Mains in Leiston Road for HVDC cable and haul road.	Protective track matting will be installed along the haul road up to the boundary of the existing highway (Leiston Road). If the asset is identified to sit under the temporary bellmouth its composition will provide	Agree with Cadent Gas position.	Agreed



Ref	Relevant Application Document	Summary of Description of Matter	Cadent Gas current Position	The Applicant Current Position	Status
			<p>sufficient clearance to utility due to subbase and surface profile.</p> <p>The HVDC cable will be installed using an open-cut method, and appropriate clearance will be agreed upon to existing assets.</p>		

## 3.2 Protective provisions

**Table 3.2 Protective Provisions**

<b>Ref</b>	<b>Relevant Application Document</b>	<b>Summary of Description of Matter</b>	<b>Cadent Gas Current Position</b>	<b>NGET Current Position</b>	<b>Status</b>
3.2.1	N/A	Asset Protection Agreement	Cadent's existing easement strips are not permitted without approval and will necessitate a Deed of Consent or Crossing Agreement being put in place. Any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions/Asset Protection Agreement and early discussions are advised.	To be developed with the Applicant and BCLP.	Under discussion

# 4. Approvals

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**Signed**

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**On Behalf of** National Grid

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**Name**

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**Position**

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**Date**

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**Signed**

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**On Behalf of** Cadent Gas Limited

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**Name**

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**Position**

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**Date**

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## 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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