

Sea Link

Volume 9: Examination Submissions

Document 9.52: Draft Statement of Common Ground Between National Grid Electricity Transmission and East Suffolk Water Management Board.

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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 the East Suffolk Water Management Board (‘ESWMB’). 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 This SoCG was sent to the ESWMB on the 10 October 2025 and we are awaiting comments back. The position shown in Section 3 of this SoCG follows the meetings held during the DCO preparation process.
- 1.2.3 This SoCG will be progressed during the Examination periods to reach a final position between the Applicant and ESWMB 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 ESWMB will jointly be referred to as the “Parties”. When referencing the ESWMB alone, they will be referred to as “the Consultee”.

1.3 Role of ESWMB in the DCO process

- 1.3.1 The Consultee is a Statutory Consultee under the Land Drainage Act 1991. The Consultee is ESWMB, a member Board of the Water Management Alliance (WMA). The WMA is a consortium of individual drainage boards (IDBs) operating in South Lincolnshire and East Anglia (UK). Members include Broads IDB, East Suffolk WMB. The Proposed Project interacts with the catchment boundaries of the Upper Alde (N) (CMT175G), Hazlewood Marshes (CMT174G), and Thorpness Hundred River (CMT164G).

- 1.3.2 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 SoCG between the Consultee and National Grid.
- 1.3.3 The Consultee has been encouraged to discuss and work with the Applicant at the pre-application stage of the Application process for the Applicant and the Consultee has existing watercourses within the Proposed Project's Order Limits.

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.

Abbreviation/Term	Definition
ESWMB	East Suffolk Water Management Board
EA	Environment Agency
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Individual Drainage Board
LDA	Land Drainage Act
PRoW	Public Right of Way
SPR	Scottish Power Renewables
TJB	Transition Joint Bay
WMA	Water Management Alliance
WMB	Water Management Board

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 ESWMB

Date	Topic	Discussion points
05/08/2022	Initial consultation email	Initial consultation email sent to ESWMB. 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 ESWMB's assets.
26/08/2022	Initial consultation response	ESWMB responded with initial thoughts (document name: 20220826_Response), as well as highlighting that the drawings did not contain all WMB district boundary catchments and maintained watercourses. Within the email is also attached: ESWMB byelaws PDF. ESWMB asked for shapefiles of the proposal.
12/09/2022	Email response	The Proposed Project's engineering team responded with proposed dates for a meeting to discuss initial thoughts. Shapefiles of cable alignment as design is under development and to be shared at a later date.
17/10/2022	Initial consultation meeting	Initial consultation meeting between the Proposed Project's engineering and consenting teams with ESWMB.
Oct – Dec 2022	Non-statutory Consultation	A period of non-statutory consultation was held between the 24 of October 2022 and 18 December 2022. The consultation introduced the Proposed Project and its background through documentation, including a corridor and preliminary routing and siting study.
30/11/2022	Follow up email	Design update documentation issued to ESWMB.
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.
July 2024	Targeted Consultation	Proposed Project 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.

Date	Topic	Discussion points
09/01/2025	Proposed project update email chain	<p>Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0478) issued to ESWMB alongside a design update document 'SEAL-MMD-SEAL-ENG-TCN-0758' for review.</p> <p>Receipt of information was received on the 27/01/2025 (from the Planning team at Water Management Alliance (WMA), working for our member East Suffolk Water Management Board) with a request for grid references for each of the interfaces. These were subsequently provided on 30/01/2025.</p> <p>On 04/04/2025, the WMA confirmed they received the grid references and that they will provide feedback on the documents. Additionally, it was noted that the WMA (on behalf of ESWMB) is currently undertaking a review of protective provisions for other projects, with a view to developing a protective provisions template to propose to other projects. WMA will soon be in a position to present this template to the project for inclusion in the draft DCO.</p>
14/03/2025	Proposed project Update response (feedback)	<p>The ESWMB noted that the board is now called the ESWMB rather than the East Suffolk individual drainage board. The ESWMB commented directly on the issued MOU (SEAL-MMD-SEAL-ENG-REP-0478) and design interface document (SEAL-MMD-SEAL-ENG-TCN-0758). Their comments were responded to and addressed in the following revisions of the documentation. However, some notable comments are included below.</p> <p>Draft Memorandum of Understanding version P02</p> <ul style="list-style-type: none"> • SoCG to be progressed over the MoU. • Comments to be addressed on edited attached copy. • Some of the contents in sections 4 and 5 will be superseded by protective provisions if that route is taken. <p>Sea Link Design Interface (SEAL_MMD_SEAL-ENG-TCN-0758)</p> <ul style="list-style-type: none"> • Table 1 to be updated to include the relevant regulator. • S/WA/0004, 0005 and 0006 (all trenchless) are in ESWMB district (catchment CMT164G) • S/WA/0068 and 0070 (permanent access over River Fromus) are in ESWMB district (catchment CMT175G) • Some crossings are outside ESWMB district; therefore, the WMB will not regulate these.

3. Areas of Discussion Between the Parties

3.1 Design criteria

Table 3.1 Design criteria

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
3.1.1	Suffolk Drainage Strategy – Revised document to be Issued	Buffer Zones (uninterrupted area between works and assets)	Buffer zone of 20 m on each side of watercourse for trenchless crossing is acceptable to the ESWMB.	To be discussed in line with the new drainage strategy when issued.	Under Discussion
3.1.2	Suffolk Drainage Strategy – Revised document to be Issued	Buffer Zones	ESWMB does not regulate Buffer strips around/along non-board maintained watercourses.	To be discussed in line with the new drainage strategy when issued.	Under Discussion
3.1.3	Suffolk Drainage Strategy – Revised document to be Issued	Design Criteria for proposed permanent works.	Design storm event of 1-100 years + 40% Climate Change Agreed.	To be discussed in line with the new drainage strategy when issued.	Under Discussion
3.1.4	Suffolk Drainage Strategy – Revised	Design Criteria for proposed temporary works.	1-5 years + 10% Climate Change Agreed. Dependent on the duration	To be discussed in line with the new drainage strategy when issued.	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
	document to be Issued		of the works and LLFA guidance		
3.1.5	Suffolk Drainage Strategy – Revised document to be Issued.	Reinstatement	Reinstatement of riverbank as per the owner’s requirements.	To be discussed in line with the new drainage strategy when issued.	Under Discussion

3.2 Consents and regulation

Table 3.2 Consents and regulation

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
3.2.1	N/A	Watercourse ownership	Designated watercourses that are integral to the water catchment are maintained by ESWMB, but still privately owned	Bylaw 10 – Any intervention within 9 m radius from maintained WMB watercourse requires consent.	Agreed
3.2.2	N/A	Watercourse cross-section	Consent under section 23 of the Drainage Act 1991 is required from the ESWMB for watercourses within WMB catchments if the cross-section of a watercourse is affected.	Agree with WMB position.	Agreed
3.2.3	N/A	Trenchless crossing	No consent required for trenchless crossing (HDD) crossing underneath non-board maintained watercourses within WMB catchment. Consent will still be needed from land/riparian owner.	Agree with WMB position.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
3.2.4	N/A	Dewatering	Temporary, permanent, and dewatering discharge into watercourses within the WMB catchment requires consent.	Bylaw 3 to be used. There is no fixed rate of discharge provided by ESWMB, but recommend following National Planning Policy Framework (NPPF). Instead, the proposed rate is given to WMB internal engineer for judgment. Therefore, continued communication is required during process.	Under discussion
3.2.5	N/A	Third party agreements	ESWMB will not be a third party for any landowner agreement.	Separate land/riparian owner consenting required.	Agreed
3.2.6	N/A	Working within floodplain permission	WMB do not regulate	Applicant to approach other regulators including Environment Agency (EA) consents permission for working in floodplain.	Agreed
3.2.7	N/A	Open cut crossings	No open-cut crossing through WMB watercourse	No further comment.	Closed

3.3 The proposed project and watercourses managed by ESWMB

Table 3.3 The proposed project and watercourses managed by ESWMB

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
3.3.1	N/A	Asset interfaces	<p>ESWMB to reviewed the design interface document issued on 09/01/2025.</p> <p>ESWMB have no objections to the methodology highlighted within the design interface document (SEAL-MMD-SEAL-ENG-TCN-0758).</p>	<p>Where a new access (haul road) crosses a watercourse, a temporary or permanent box culvert or flume will be installed. The culvert is to have a minimum internal area 1200 x 2700 mm - to be agreed with WMB once flow modelling is completed. Mammal ledges are to be included on both banks and the invert of culvert is to be installed below the bed of the watercourse.</p>	Under discussion
3.3.2	N/A	Haul Roads	<p>ESWMB support the type of crossing outlined in the design interface document (SEAL-MMD-SEAL-ENG-TCN-0758), but noted that most crossings are not under IDB regulation.</p>	<p>Agree with WMB position.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESWMB Current Position	The Applicant Current Position	Status
3.3.3	N/A	Cable crossings – open cut	All crossings will require warning tape/stakes and a strike plate above the cable.	Agree with WMB position.	Agreed
3.3.4	N/A	Trenchless crossings	ESWMB is happy that the strike plate is not used for trenchless crossings. Markers required at watercourse edges	Warning tape and strike plates can only be installed at the transition points of each side of the crossing from ground level. But not beneath the watercourse.	Agreed

4. Approvals

Signed	
On Behalf of	East Suffolk Water Management Board
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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