

Sea Link

Volume 9: Examination Submissions

Document 9.53: Statement of Common Ground Between National Grid Electricity Transmission and EDF Nuclear Generation Limited (ENGL)

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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 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.
- 1.1.3 This SoCG is between National Grid Electricity Transmission Ltd (“NGET”) and the EDF Nuclear Generation Limited (ENGL) relating to the DCO application for the SEA Link 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 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and ENGL. The SoCG will evolve as the DCO application progresses to submission and through examination.
- 1.2.2 For the purpose of this SoCG, National Grid and ENGL will jointly be referred to as the “Parties”. When referencing ENGL alone, they will be referred to as “the Consultee”.
- 1.2.3 Throughout the SoCG:
- Where a section begins ‘matters agreed’, this sets out matters that have been agreed between the Parties and where there is no dispute.
 - Where a section begins ‘matters not agreed’, this sets out matters that are not agreed between the Parties and where a dispute remains.
 - Where a section begins ‘matters outstanding, this sets out matters that are subject to further negotiation between the Parties.
 - Section 5 sets out matters where agreement is currently outstanding between National Grid and ENGL.

1.3 Description of the Proposed Project

- 1.3.1 The Sea Link Project (hereafter referred to as the ‘Proposed Project’) is a proposal by National Grid Electricity Transmission plc (hereafter referred to as 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 an addition to 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 400kV 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.

1.3.8 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.

1.4 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’ 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. The Parties have also indicated the likelihood that agreement will be reached on each item.
- 1.4.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
ENGL	EDF Nuclear Generation Limited

Abbreviation/Term	Definition
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
TJB	Transition Joint Bay

2. Record of Engagement

2.1 Role of ENGL in the DCO process

- 2.1.1 ENGL is the owner and operator of the Sizewell B Nuclear Power Station. Sizewell B is a Pressurised Water Reactor and is capable of generating 1250MW
- 2.1.2 Sea Link interacts with the area in which ENGL's Sizewell B power station is located and operates. In particular the construction project will be taking place within the Sizewell Extended Emergency Planning Zone. Nuclear safety and security is therefore an important consideration. Therefore, the consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between ENGL and National Grid.
- 2.1.3 ENGL has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the project.

2.2 Summary of discussions

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

Table 2.1 Record of meetings and correspondence with ENGL

Date	Topic	Discussion points
Quarterly	Joint Update Meetings	Suffolk Energy Projects Meeting – All projects providing updates on progress etc
May 21 to date	Emails / Meetings	There have been a number of meetings and email exchanges between the project and ENGL since 2021.

3. Areas of Discussion Between the Parties

3.1 Nuclear Safety and Security

Table 3.1 Nuclear Safety and Security

Ref	Relevant Application Document	Summary of Description of Matter	ENGL Current Position	NGET Current Position	Status
3.1.1	N/A	Suffolk Resilience Forum Radiation Emergency Plan	Sea Link will need to be included in the area emergency response plan	The Applicant will continue to liaise with Suffolk County Council to ensure that appropriate updates are made to the Suffolk Resilience Forum Radiation Emergency Plan to accommodate the construction, operation and decommissioning of the Proposed Project.	Agreed
3.1.2	N/A	Sizewell B On Site Emergency Plan	As the Project does not encroach onto Sizewell B operational land, the construction or operation of the Project does not require the amendment of the Sizewell B On Site Emergency Plan.	Noted.	Agreed

4. Approvals

Signed	
On Behalf of	NGET
Name	
Position	
Date	10/11/2025

Signed	
On Behalf of	ENGL
Name	
Position	
Date	11/11/2025

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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