

# Sea Link

## Volume 9: Examination Submission

Document 9.57: Draft Statement of Common Ground Between National Grid Electricity Transmission and Northumbrian Water.

Planning Inspectorate Reference: EN020026

Version: A  
November 2025

**nationalgrid**

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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 matter’s 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 Northumbrian Water Group Limited (‘Northumbrian 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).
- 1.2.2 This SoCG has been sent to Northumbrian Water on the 18 June 2025 for review and we are currently awaiting comments. The areas it which we are agreed have been agreed via meetings and emails with Northumbrian Water.
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and Northumbrian 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.
- 1.2.4 For the purpose of this SoCG, National Grid and the Northumbrian Water will jointly be referred to as the “Parties”. When referencing the Northumbrian Water alone, they will be referred to as “the Consultee”.

## 1.3 Role of Northumbrian Water in the DCO process

- 1.3.1 Northumbrian Water and Essex & Suffolk Water are part of Northumbrian Water Limited, a company registered in England and Wales, which is a member of Northumbrian Water Group Limited (NWGL). The principal regulated company in the Northumbrian Water Group is Northumbrian Water Limited (Northumbrian Water), which is a directly wholly-owned subsidiary of NWGL, and operates in the north east of



England as 'Northumbrian Water' and in the south east of England as 'Essex & Suffolk Water'.

- 1.3.2 Northumbrian Water are the regional water and sewerage undertakes in the north east of England by virtue of an appointment made under the Water Industries Act 1991, regulated by Ofwat. 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 Northumbrian Water and National Grid.
- 1.3.3 Northumbrian 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 Northumbrian Water has existing assets 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
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 Northumbrian Water**

Date	Topic	Discussion points
03/08/2022	Initial consultation email	Initial consultation email sent to Northumbrian 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 Northumbrian Water's assets.
31/08/2022-13/09/2022	Email chain	Northumbrian Water requested CAD files to review and assess crossing points. Response from engineering team stating that the proposed project is not at a stage to share CAD files. Northumbrian Water acknowledged this stating that they will review the proposals.
24/10/2022	Update email	Email sent Northumbrian Water containing Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0460) and Pro Forma (SEAL-MMD-SEAL-ENG-REP-0459) to be reviewed.
Oct – Dec 2022	Non-statutory Consultation	A period of non-statutory consultation was held between, the 24 <sup>th</sup> 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.
14/02/2023	Follow-up email	Email sent to seek progress on the Pro Forma sent to Northumbrian Water by the proposed project's engineering team at the end of 2022.
16/03/2023	Pro Forma response	Reply received including completion of the Pro Forma (SEAL-MMD-SEAL-ENG-REP-0459). Accompanied with drawings and documents providing information to aid in the re-alignment of HV cables.
19/10/2023	Consultation meeting	Meeting chaired by the proposed project's engineering team with Northumbrian Water. Updated cable alignment DWG shared and crossing interfaces discussed.
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

Date	Topic	Discussion points
		assessments. As a result of this work, changes to the plans where shared.
03/01/2025	Protective provisions email	Email to Northumbrian Water inquiring if they have any proposed protective provisions.
09/01/2025	Proposed project update email	Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0460 P03) issued to Northumbrian Water alongside a design update document 'SEAL-MMD-SEAL-ENG-TCN-0748' for review.
30/01/2025	Proposed project update email response	East Suffolk Water (ESW) responded to the proposed project update email stating that they will need to discuss a consultation fee estimate.
21/02/2025	Proposed project update meeting	Meeting confirmed for the 25 <sup>th</sup> of February between the proposed project's engineering and consents team and ESW to discuss the proposed project update.
03/03/2025	ESW high level assessment of the proposed projects proposals	<p>Meeting with Northumbrian Water to discuss the proposed developments and what the proposed project would like from them. Northumbrian Water to provide a cost estimate for consultation on the proposed works and to review the design update document 'SEAL-MMD-SEAL-ENG-TCN-0748' and provide comment.</p> <p>Email from Northumbrian Water providing details of a high level assessment of Sea Link's proposals and have produced an estimate for consultations. Attached to the email were the following documents.</p> <ul style="list-style-type: none"> <li>• Sea Link Budget cost Letter 03.03.25</li> <li>• BACS Payment Details</li> <li>• Conditions for excavating Near ESW Assets</li> <li>• Sea Link - Consultation Fees Budget Cost Summary</li> </ul> <p>The total cost of the consultation of £214,548.34 is required by Northumbrian Water this includes resource for the following.</p> <ul style="list-style-type: none"> <li>• Asset impact assessment</li> <li>• Investigative exercises</li> <li>• Supervisor/Supervision/Site visits</li> <li>• Administration/Project management</li> <li>• Legal support for protective provisions</li> <li>• ESW/Mott Macdonald meetings.</li> </ul>
14/03/2025	Consultation fee meeting	MS teams meeting with Northumbrian Water to understand the breakdown of the proved consultation fee. Mainly to



Date	Topic	Discussion points
		establish what is covered by the legal fees and what stages of the design they have priced their consultation for.
25/03/2025	Consultation fee meeting	<p>MS teams meeting with Northumbrian Water to discuss payment options of the consultation fee. Northumbrian Water stated that payments are usually given in one lump sum.</p> <p>It was noted that many of the items covered in the consultation would be required when the proposed project designs are developed further. At this stage, the proposed project will share the statement of common ground to establish an understanding of the matters between both parties. Northumbrian Water agreed to share the statement of common ground with their legal team for comment.</p>
21/05/2025	Meeting to discuss the consultation fee with a project update.	<p>MS teams meeting with Northumbrian Water to discuss their consultation fee and updates with the proposed project's engineering team. The meeting discussed the proposed Sea Link project's current status and Northumbrian Water Group's involvement. Northumbrian Water requested clarity on the scope of work required to support the project, particularly regarding a cost estimate submitted in March 2025. The proposed project's engineering clarified that some quoted activities, like supervision and site visits, are not yet needed. NWG stated they cannot proceed without payment. The engineering team will confirm with National Grid the specific commitments required from Northumbrian Water and provide a scope. Northumbrian Water will then review and reprice accordingly.</p>
23/05/2025	Update following previous meeting	Email to Northumbrian Water confirming what the proposed project requires from them at this stage that is a review of and comment on the Statement of Common Ground and Design Interface Document.

## 3. Areas of Discussion Between the Parties

### 3.1 Interfaces with Northumbrian Water assets

**Table 3.1 Interfaces with Northumbrian Water assets**

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.1.1	N/A	Trenchless crossing of 250PE distribution main	Clearance of 1m required	Minimum 1 m clearance required. Landfall drills will be at depth and monitored throughout drilling process.	Agreed
3.1.2	N/A	S/UT/W/0016 – 250PE Distribution Main	Minimum 1m clearance required. Note that PVC Mains are fragile and require additional care.	Main to be ducted with 12 m span across interface. Minimum 1 m clearance to be accommodated for both bellmouth and HVDC cable. Note that PVC Mains are fragile and require additional care.	Under Discussion
3.1.3	N/A	S/UT/W/0018 – 8" PVC Distribution Main		Additional protective haul road matting to be installed for further protection.	
3.1.4	N/A	S/UT/W/0041 – 4" AC Distribution Main			
3.1.5	N/A	Haul road interfaces with main that runs parallel with the B1119. The following crossing reference have been	Where a road is to be constructed above the strategic main, a concrete raft will normally be required over the main. Where plant	Protective haul road track matting is to be installed to protect buried assets in any areas where the existing track alone is not suitable. Where a new bellmouth is	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
		provided for each interface- S/UT/W/0064.1, S/UT/W/0064.2, S/UT/W/0064.3 and S/UT/W/0072.	and machines have to cross over a strategic main and precautions are needed to protect the main from damage, these must be approved beforehand.	required composition of the bellmouth will provide sufficient clearance to the utility due to subbase and surface profile. Protective matting to be installed during initial mobilisation to bridge structure along access to Wood Farm. NGET position to be approved by Northumbrian Water.	Under Discussion
3.1.6	N/A	Induced Voltage	Concern raised with regards to any induced voltages produced from the cable.	The HV cables cross assets as close to 90 degrees as possible. Further calculations to address concerns raised will be assessed in the later stages of the project.	
3.1.7	N/A	Heat radiation from the cables	Water passing through the pipes should remain underneath 20oC at all times.	Cable system design, which will be carried out at a later stage of design, will identify the temperature produced by the cables and different depths. Where possible, cables will be located sufficiently away from the asset to reduce risk of increasing heat. Where this this is not possible further discussion will	

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.1.8	N/A	Interface angle	Northumbrian Water would prefer that the cables pass underneath their assets in all cases.	<p>take place to determine next steps.</p> <p>Only four interfaces between assets and Sea Link cable. One of which will cross using trenchless drilling and, therefore, will be underneath with a minimum 1m clearance. The remaining three are to be ducted with 12 m span across interface. Minimum 1 m clearance to be accommodated.</p>	<div>Agreed</div>



## 3.2 Construction matters

Table 3.2 construction matters

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.2.1	N/A	Locating the assets	Northumbrian Water do not have details on the depths of their assets therefore investigations by National Grid and their Contractors will be required to ascertain depth. Trial holes over assets are also likely to be required to confirm depths prior to detailed design.	All assets to be identified through trial holes with watching briefs.	Agreed
3.2.2	N/A	Backfilling of trenches	Where the pipe, sewer or drain is laid beneath a strategic main the backfilled material should be well compacted by hand to a minimum depth of 300mm above the top of the strategic main. The material used for backfilling should be fine grained, gravel or lean concrete.	To be passed onto / confirmed with the contractor.	Under Discussion

### 3.3 Proposed projects by Northumbrian Water

**Table 3.3 Proposed projects by Northumbrian Water**

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

### 3.4 Protective provisions

**Table 3.4 Protective provisions**

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.4.1	N/A	Protective provisions	Raised the option of renewing the assets to avoid the need to access them during trial pits/manhole	Protective provisions to be discussed with BCLP and Northumbrian Water.	Under Discussion

# 4. Approvals

Signed	
On Behalf of	NGET
Name	
Position	
Date	

Signed	
On Behalf of	Northumbrian Water Group
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>



National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)