

Sea Link

Volume 9: Examination Submissions

Document 9.60: Draft Statement of Common Ground Between National Grid Electricity Transmission and Sizewell C (Pledgeco) Limited.

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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 Sizewell C (Pledgeco). 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 Sizewell C on the 15 October 2025 for review and we are currently awaiting comments.
- 1.2.3 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and Sizewell C. The SoCG will evolve as the DCO application progresses to submission and through examination.
- 1.2.4 For the purpose of this SoCG, National Grid and the Sizewell C will jointly be referred to as the “Parties”. When referencing the Sizewell C alone, they will be referred to as “the Consultee”.
- 1.2.5 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 the SPR.

1.3 Role of SPR in the DCO process

- 1.3.1 Sizewell C is the company formed to build the new Sizewell C Nuclear Power Station. Sizewell C is a 2 reactor 3.2 gigawatt nuclear power station, location adjacent to Sizewell B on the Suffolk Coast.
- 1.3.2 Sea Link interacts with the area in which Sizewell C's construction is taking place and interacts with the traffic and works in the surrounding Suffolk area. Therefore, the consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between Sizewell C and National Grid.
- 1.3.3 Sizewell C has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the project.

1.4 Description of the Proposed Project

- 1.4.1 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 South East 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.
- 1.4.2 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
Sizewell C	Sizewell C (Pledgeco) Limited
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
TJB	Transition Joint Bay

2. Record of Engagement

2.1 Summary of pre-application 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 Sizewell C

Date	Topic	Discussion points
Quarterly	Joint Update Meetings	Suffolk Energy Projects Meeting – All projects providing updates on progress etc – Hosted by Suffolk Council
Monthly	Major Projects Coordination Call	All companies discuss updates on there projects in the Suffolk region – hosted by NGET
11/11/2024	Coordination	Discussion between NGET on Sizewell on areas of co-ordination – such as program, work force numbers, Park and Ride, Accommodation use of shared infrastructure
10/09/2025	Shipping and Navigation	Post application meeting was held on 10 September 2025 to address RR concerns with SZC Harbour authority also in attendance.
28/10/2025	Shipping and Navigation	Hazard workshop held to discuss updates to NRA.

3. Areas of Discussion Between the Parties

3.1 Areas of possible co-ordination

Table 3.1 Areas of possible co-ordination

Ref	Relevant Application Document	Summary of Description of Matter	Sizewell C's Current Position	The Applicant Current Position	Status
3.1.1	N/A	Use of Sizewell C – Park and Ride Facility	Sizewell C has 2 park and ride facilities in the area, these are being constructed to serve the Sizewell C construction works. Should there be spare capacity available at site , with agreement from Sizewell C this may be used by others.	The Applicant has agreed to have further discussions with the Consultee over the programs of both proposed project to assess whether there is any availability to use the park and ride facilities	Under Discussion
3.1.2	N/A	Use of Sizewell C – Accommodation	Sizewell C has 2 accommodation centres, one on site and one at Lowestoft. There may be opportunity for NGETs contractors workers to use these facilities	The Applicant has agreed to discuss further with the Consultee the use of these facilities based on program overlap.	Under Discussion
3.1.3	N/A	Use of Sports Facilities at Leiston	Sizewell C is investing in local sports facilities in Leiston for all to use, also they will have facilities at the accommodation block		Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	Sizewell C's Current Position	The Applicant Current Position	Status
			mentioned above which may be available for use.		

3.2 Shipping and Navigation

Table 3-2 Shipping and Navigation

Ref	Relevant Application Document	Summary of Description of Matter	EA Current Position	The Applicant Current Position	Status
3.2.1	N/A	Shipping and Navigation	Due to its proximity to the Sea Link northern Order Limits, SZC's marine activities should be considered in the Sea Link DCO. However, the Sea Link submission appears to overlook these activities, aside from a passing mention of the cooling water intake and outfalls. Given potential overlaps in marine construction activities, this omission is significant and requires meaningful consultation between National Grid and SZC, as well as direct contact with the established SZC Harbour Authority, to avoid potential conflicts.	The Applicant acknowledges this omission, and is now consulting with SZC and the SZC Harbour Authority as key stakeholders. An initial meeting was held on 10 September 2025, with a follow-up Hazard workshop held prior to examination. The meetings yielded positive discussion and the Applicant is confident they have addressed all issues raised in the Relevant Rep relating to shipping and Navigation and will continue engagement with the Consultee.	Under Discussion
3.2.2	N/A	Shipping and Navigation	At the EIA Scoping stage, Sea Link tried to scope out displacement resulting in increased vessel-to-vessel collision risk between third-party vessels during the construction,	The Applicant acknowledges the need to consider the offshore works and vessel movements associated with SZC.	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	EA Current Position	The Applicant Current Position	Status
			<p>maintenance and decommissioning phases. However, the Planning Inspectorate (PINS) and the Maritime and Coastguard Agency (MCA) advised against this, citing a lack of supporting data and the need to complete a Navigation Risk Assessment (NRA) first. Sea Link has submitted an NRA for examination which will now be subject to scrutiny.</p> <p>However, the Sea Link documents regarding shipping and navigation do not acknowledge the offshore works and movements associated with SZC, despite it falling within the 10 nautical mile (NM) study area. Neither the submitted NRA nor the Collision Risk Assessment (CRA), which is summarised in the NRA, include engagement with or consideration of SZC (including as a Statutory Harbour Authority) and the risks associated with shipping and navigation to aid SZC's construction. This omission is particularly important as large vessel movements to and from</p>	<p>The Sea Link Navigational Risk Assessment (NRA) (Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]) will be updated to include consideration of SZC Harbour Authority Area. The Applicant also held a Hazard Workshop with the Consultee before the start of Sea Link Examination phase to discuss potential concerns surrounding shipping and navigation in more depth and log them, to feed into the NRA.</p> <p>The SZC Relevant Representation refers to the Sea Link CRA, but the Applicant enquires whether this a perhaps a typo, because a CRA has not been undertaken or documented within the NRA for Sea Link. A Formal Safety Assessment (FSA) approach has been followed to assess shipping and navigation risks, and presented as a subsection within the NRA. Any updates to the Sea Link NRA in light of offshore works and vessel movements associated with SZC can expect to also</p>	

Ref	Relevant Application Document	Summary of Description of Matter	EA Current Position	The Applicant Current Position	Status
			SZC will cross the proposed route of the Sea Link project.	include updates to the FSA section of the NRA.	
3.2.3	N/A	Shipping and Navigation	<p>There does not appear to be any detail as yet of the offshore construction or vessel routes for Sea Link and so, it cannot be guaranteed that there will be no conflict with SZC. The Sea Link oOCEMP states at para. 1.11.32 that: <i>“A Navigational Installation Plan (NIP) will be developed post submission prior to offshore construction. The NIP provides a mechanism to ensure effective communication and coordination between the Project and all relevant shipping and navigation stakeholders, including port and harbour authorities, Traffic Separation Scheme (TSS) operators, and other offshore projects. This will maintain ongoing awareness of Offshore Scheme installation fleet activities during the construction phase amongst relevant parties, set out planned protocols, and enable coordination with stakeholders as required.”</i></p>	<p>The Applicant acknowledges the Consultee’s offshore proposals to aid construction of the Nuclear Power Station.</p> <p>The Applicant has submitted a draft Outline NIP (Document Ref AS-104) to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. The Applicant will continue to engage with the key shipping and navigation stakeholders to update and refine the Outline NIP AS-104 – 9.12 Outline Navigation and Installation Plan through the Examination phases.</p> <p>The Applicant have taken on board Consultee’s concern relating to cumulative impacts and have updated the OSU chapter to include an assessment of impacts during all phases on SZC construction and operations to be submitted at Deadline 1.</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	EA Current Position	The Applicant Current Position	Status
			<p>Given Sea Link is predominantly an offshore project, developing a NIP prior to offshore construction seems too late given the existing and proposed activities in this stretch of the southern North Sea / northern English Channel. We therefore submit this relevant representation to ensure there is no conflict between marine construction routes or cumulative environmental impacts, particularly as the majority of construction vessels for SZC will be coming from the south. At present, it is not clear that Sea Link is aware of SZC's offshore proposals to aid construction of the Nuclear Power Station as only onshore elements of SZC are mentioned in Sea Link's cumulative effects assessment. Given the construction programmes of both projects will certainly overlap, this is of significant concern.</p>	<p>Offshore elements of cumulative impacts were addressed in Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083] and Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084].</p>	
3.2.4	N/A	Shipping and Navigation	<p>In light of the above, we request that protective provisions for construction activities and vessel movements are included in the</p>	<p>The Applicant notes this request and finds the matter as a subject for further discussion and engagement between the</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	EA Current Position	The Applicant Current Position	Status
			Sea Link DCO, to safeguard the rights, interests and operations of SZC, such that SZC is not unduly compromised by the Sea Link DCO. Protective provisions for SZC were recently included in Scottish Power Renewables' (SPR) East Anglia One North (Ref. EN010077) and East Anglia Two (Ref. EN010078) Offshore Windfarm DCOs, which may be of use.	Applicant and the Consultee. The Applicant will work with the Consultee and other key shipping and navigation stakeholders to find agreement on potential protective provisions if necessary.	

4. Approvals

Signed	
On Behalf of	Sizewell C
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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