The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

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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 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 UK Power Networks (Operations) Limited ('UKPN'). 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 received back with comments from UKPN, we will be reissuing this document for review and comments on the 20 November 2025.

1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and UKPN 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.For the purpose of this SoCG, National Grid and the UKPN will jointly be referred to as the "Parties". When referencing the UKPN alone, they will be referred to as "the Consultee".

1.3 Description of the Proposed Project

1.3.1 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.

1.3.2 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 400 kV 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', '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.

1.4.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
AL	Aluminium
XLPE	Cross linked polyethylene
DCO	Development Consent Order
HV	High Voltage

Abbreviation/Term	Definition
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
HDD	Horizontal Direction Drill
LV	Low Voltage
LVWF	Low Voltage Waveform
OHL	Overhead Line
PRoW	Public Right of Way
RMU	Ring Main Unit
SPR	Scottish Power Renewables
TJB	Transition Joint Bay
UKPN	UK Power Networks (Operations) Limited

2. Record of Engagement

2.1 Role of UKPN in the DCO Process

2.1.1 UKPN are local Distribution Network Operator (DNO); operates under a Distribution Code License and is regulated by Ofgem. The project interacts with South Eastern Power Networks (SPN) and Eastern Power Networks (EPN) that both hold their own Electricity Distribution license.

2.1.2 The consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between UKPN and National Grid.

2.1.3 UKPN has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the project and UKPN has existing assets within the project's order limits

2.2 Summary of pre-application discussions

2.2.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the DCO application.

Table 2.1 Pre-application discussions

Date	Topic	Discussion points
05 December 2022	*Initial consultation email*	*Initial consultation email sent to UKPN. 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 UKPN's assets.*
October – December 2022	*Non-statutory Consultation*	*A period of non-statutory consultation was held between, the 24th of October 2022 to 18 December 2022. The consultation introduced the project and its background through documentation including a corridor and preliminary routing and siting study.*
01 February 2023	*Initial consultation meeting*	*Microsoft Teams meeting between engineering the team of the project and UKPN to provide updates on progress and timeframes for planning submission and construction. The meeting was to share information regarding the projects including indicative construction plans along with establishing crossing point parameters and requirements.*

Date	Topic	Discussion points
February - September 2023	*Email chain*	*Email chain exchanging information and Sea Link design updates for UKPN to produce a connections feasibility report.*
October – December 2023	*Statutory Consultation*	*Statutory public consultation occurred from the 24th of 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.*
06th June 2024	*Teams Meeting*	*Meeting between the Sea Link /Friston and UKPN teams to discuss the ongoing works around the Friston Substation and the wider interactions with UKPN and their network assets.*
July 2024	*Targeted Consultation*	*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 where shared.*
18th October 2024	*Connections Feasibility report issued*	*Connections feasibility report issued to Sea Link engineering team.*
7th November 2024	*Site Visit*	*Site visit with UKPN and SPR to discuss the Sea Link and Friston Interactions with the UKPN network assets*
2nd April 2025	*In person Meeting*	*Meeting between the UKPN and Sea Link teams to discuss the interactions of the Sea Link Project and the UKPN network in both Suffolk and Kent. Walk through of the proposals form the feasibility report provided in October 2024 include the decision to remove some of the works from the Scope. Action agreed for an update report and cost to be sent to the Applicant in July / August 2025*
6th October 2025	*Budget estimates sent*	*Budget estimates and conceptual drawings shared with the Applicant for five diversions in Suffolk and two diversions in Kent.*
20th October 2025	*UKPN / NG Sea Link SoCG and Diversion Checks*	*Meeting to discuss the SoCG and check the scope and descriptions of the diversion required by the scheme.*

3. Areas of Discussion Between the Parties

3.1 Topic 1 – Design interfaces (Suffolk)

Table 3.1 Design interfaces (Suffolk)

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
3.1.1	N/A	Leiston Road overhead line (OHL) Interface	A section of LV OHL network needs to be diverted that is normally fed from Leiston Primary. It includes the removal of 4 poles and approximately 100m of overhead line, plus the installation of 2 new terminal poles and c. 100m of underground cable.	The specification of the OHL at the Sea Link interface will need to be provided, however, the principle of UKPN's proposal to introduce 2No. LV Terminal Poles and lay an underground cable between the two poles will be suitable for the bellmouth and HVDC Cable alignment interface.	Under discussion
3.1.2		Permanent access to Friston Substation	Not currently assessed by UKPN	To manage this interface two options are proposed by Sea Link. 1. Suitably divert the UKPN assets (area has been included within the order limits to facilitate this). 2. Use OHL Goalposts during the construction of the permanent road then ensure sufficient	No Longer required by the scheme

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
				clearance during operation. These options require further discussion with UKPN.	
3.1.3		Haul road southwest of the Friston reservoir	UKPN proposal of diversion is outdated due to design of haul road routing changing since UKPN proposal	It is proposed OHL goalposts to be used. The clearance to the 11kV OHL should be surveyed for construction movements underneath and assessment should be made if the use of OHL Goalposts would be suitable.	No Longer required by the scheme
3.1.4		OHL Circuits South of Snape Road	UKPN proposal is summarised for each circuit below. North – south circuit: Pole Mounted Transformers to be replace by a single Tx at 315kVA to maintain the existing LV supplies and undergrounding the 9 span supply via a diversion. East – West circuit: Divert route underground following the south east verge of Snape Road.	The Applicant is happy with the proposal by UKPN. More discussion is required once the Applicant appoints their onshore cable Contractor. Conversations to date reflect the position agreed based on the concept design	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
3.1.5		11kV OHL south of Manor Farm Knodishall	A section of 11kV OHL network needs to be diverted that is normally fed from Leiston Primary. It includes the removal of 6 poles and approximately 400m of overhead line, plus the installation of 2 new terminal poles and c. 650m of underground cable.	The Applicant is happy with the proposal by UKPN. More discussion is required once the Applicant appoint their onshore cable Contractor. Conversations to date reflect the position agreed based on the concept design	Under discussion
3.1.6		33kV OHL across Friston Substation Site	Opportunity to divert OHL to underground from the field west of B1121 Saxmundham Road through to the field east of Sea Link's cable alignment, adjacent to River Hundred.	The Applicant has worked with SPR on the routing for this diversion and the costs have been Paid and work is underway.	Agreed
3.1.7		LV Connection to Friston Substation	UKPN is proposing for the LV supplies for the Converter Station to be fed from Leiston Primary 33/11kV. 2x RMU units have been quoted, including the cable which will be c.500m of 300sqmm AL XLPE ducted cable.	LV Connection to be discussed further, proposal by UKPN has been put forward, changes are required due to changes to the SPR supplies for their substations.	Under discussion
3.1.8		East of Redhouse Farm	A section of 11kV overhead network needs to be diverted that is normally fed from Leiston Primary. It is located between Fristonmoor and Red Farm Lane. The diversion includes	The Applicant is happy with the proposal by UKPN. More discussion is required once the Applicant appoint their onshore cable Contractor. Conversations to date	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
			the removal of 3 poles and approximately 250m of overhead line, plus the installation of 2 new terminal poles and c. 500m of underground cable.	reflect the position agreed based on the concept design	
3.1.9		11kV Cable between Friston and Knodishall (adjacent to Grove Rd)	UKPN's cable (ducted 185mm2 AL XLPE 11kV) to be diverted for circa 100m due to the bending radius and to be re-laid at a lower depth. UKPN to connect the diverted cable at the location of the existing straight joint to avoid the increase of the joints on the cable as much as possible. UKPN works to be coordinated with Sea Link works, contractor to be informed.	UKPN's position accepted	No Longer required by the Project
3.1.10		11KV OHL Crossing of the B1121 adjacent to Benhall Road over Rail Bridge		The Applicant have requested works to this crossing to facilitate the transport of AILs along the B1121 and the possible installation of a overbridge over the existing bridge.	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
3.1.11		LV Connection to Saxmundham Converter		The Applicant has applied for a power supply from the UKPN network to the Saxmundham Converter Station. An offer has been received and is being assessed, once discussed with the converter contractor the order will be placed for the supply	Under Discussion

3.2 Design interfaces (Kent)

Table 3.2 Design interfaces (Kent)

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
3.2.1	N/A	Kent 33kV OHL – Mitigation Access	Access added during Design Freeze 4 Development, so UKPN has not been consulted	The Applicant have proposed this land for mitigation therefore no changes are required for access to the land. Should this change in the future the Applicant and UKPN will discuss the appropriate course of action.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
3.2.2	N/A	Landfall interaction	Two sections of 33kV overhead network need to be diverted. These include the removal of 10 poles and 2x 400m of overhead line. It also includes the installation of 2x c. 650m of underground cables and 2 terminal poles. There is also a 3rd party generation customer connected to one section of overhead line that is being removed, whose point of connection will change.	The Applicant is happy with the proposal by UKPN. More discussion is required once the Applicant appoint their onshore and offshore cable Contractor. Conversations to date reflect the position agreed based on the concept design	Under discussion
3.2.3	N/A	11kV OHL West of A256	The OHL from Switching room [347089] all the way to Switching Station [347177] will be undergrounded which includes the removal of 11 spans consisted of 915m of 50 St Cored Aluminium 3c Open Wire 11kV OHL and 10 Poles that will be removed. The OHL will be replaced with approximately 1,260m of 300sqmm AL XLPE ducted cable to avoid derating of the circuit per UKPN's standards. Additionally, Ebbsfleet PMT Secondary Substation is teed off this main line and shall be reconnected to the	The Applicant is happy with the proposal by UKPN to deal with this asset.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
			network. To achieve that, it is proposed for the span from Pole 731542 to Pole 731545 to be undergrounded and Pole 731542 to become a terminal pole. The cable that will be connected to this pole will be undergrounded and branch joint onto the newly diverted under ground main cable to establish the continuity of the network. Currently this span is 100m long from Pole 731542 to Pole 731545 and is consisted of 50 St Cored Al 3c Open Wire, it is proposed to be replaced by 30m of 185sqmm AL XLPE ducted cable.		
3.2.4	N/A	South of the river Stour	A pole height change solution was considered in this area but National Grid has determined this will not be required. An alternative solution of completing HV outages is now being considered to enable National Grid to construct scaffolding	The Applicant have agreed this position and further discussion will be held once the Applicant appoints its OHL contractor.	Under discussion
3.2.5		LV Supply to Minster Converter and LV Supply to Minster Substation		The Applicant has applied for a power supply from the UKPN network to the	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	UKPN Current Position	The Applicant Current Position	Status
				Minster Converter and Substation Station. An offer has been received and is being assessed, once discussed with the converter contractor the order will be placed for the supply	

4. Approvals

Signed	

On Behalf of	National Grid
Name	
Position	
Date	

Signed	

On Behalf of	UKPN
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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