

Sea Link

Volume 9: Examination Submissions

Document 9.63: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Virgin Media

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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 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.
- 1.1.4 This SoCG is between National Grid Electricity Transmission Ltd (“NGET”) and Virgin Media Limited (‘Virgin Media’) 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).
- 1.1.5 This SoCG has been sent to Virgin Media for review, the details later in the document have been discussed with Virgin Media, we are awaiting their comment on the SoCG.

1.2 This Statement of Common Ground

- 1.2.1 This SoCG is between the Applicant and Virgin Media Limited (‘Virgin Media’) 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).
- 1.2.2 This SoCG has been sent to Virgin Media for review, the details later in the document have been discussed with Virgin Media via email and agreed. We are awaiting comment on the SoCG document from Virgin Media.
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and Virgin Media Limited 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 Virgin Media will jointly be referred to as the “Parties”. When referencing Virgin Media alone, they will be referred to as “the Consultee”.

1.3 Role of Virgin Media in the DCO process

- 1.1.6 Virgin Media provides broadband, TV, landline and mobile services in England, Scotland and Wales. Virgin Media are regulated by Ofcom and are on the register of persons with powers under the Electronic Communications Code.
- 1.1.7 The Applicant has consulted with the Consultee in its capacity as a prescribed consultee for the purposes of the proposed project. The consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between Virgin Media and National Grid.
- 1.1.8 Virgin Media has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the proposed project and Virgin Media has an existing asset 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’ 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.
- 1.5.3 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
SoCG	Statement of Common Ground
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 Virgin Media

Date	Topic	Discussion points
03/08/2022	Initial consultation email	Initial consultation email sent to Virgin Media. 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 their asset.
10/08/2022	Initial consultation email response	Virgin Media responded with letter outlining that they require final design with working drawings, outline programme and contact details of project manager or site agent leading works. These are to be shared at a later date when confirmed.
Oct – Dec 2022	Non-statutory Consultation	A period of non-statutory consultation was held for between, the 24 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.
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 where shared.
18/12/2024 – 29/01/2025	Proposals update email chain	Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0749) issued to Virgin Media. Alongside, a design interface update document named ‘SEAL-MMD-SEAL-ENG-TCN-0750’ outlining latest design for Virgin Media to review. Response stating Virgin Media will require a payment of £720 (£600+VAT). Once received they will send over to their design team. Also received was a copy of the current special requirements guidance process. A purchase order was sent to Virgin Media.

Date	Topic	Discussion points
		<i>A follow up sent to virgin Media regarding the shared purchase order.</i>
21/02/2025	<i>Proposed project updated response</i>	<p><i>Response from Virgin Media, providing the following under a works reference of VM.CIP.431598.</i></p> <p><i>Documents included in the email; VM.CIP.431598 C4 CivilsImages, VM.CIP.431598 C4 Detailed Specification, and VM.CIP.431598 C4 Private Developer Estimate.</i></p> <p><i>Works point reference detail.</i></p> <p><i>Proposal for Virgin Media Works – only civil engineering works envisaged, Lower cabled ducts in grass verge to below proposed construction depth of the new haul road.</i></p> <p><i>Private developer estimate fee – estimated costs of altering Virgin Media apparatus is £ 19,882.06 (including VAT).</i></p>

3. Areas of Discussion Between the Parties

3.1 The proposed project and Virgin Media Assets

Table 3.1 The proposed project and Virgin Media Assets

Ref	Relevant Application Document	Summary of Description of Matter	Virgin Media Current Position	The Applicant Current Position	Status
3.1.1		Cabled ducts in grass verge and carriageway (Leiston Road).	<p>Virgin Media does own underground apparatus within the area of your proposed works.</p> <p>Proposal by Virgin Media:</p> <ul style="list-style-type: none">• Lower cabled ducts in grass verge to below proposed construction depth of the new haul road.• Virgin Media will use project management techniques throughout to assist in monitoring timescales for various activities.	Agree with Virgin Media position.	Agreed

3.2 Management of Works

Table 3.2 Management of Works

Ref	Relevant Application Document	Summary of Description of Matter	Virgin Media Current Position	The Applicant Current Position	Status
3.2.1	N/A	Delivery/Storage	<p>Materials for civil works will be delivered to site by Virgin Media Contractor or Virgin Media on the instruction of Virgin Media supervision staff as and when required.</p> <p>Cabling and splicing materials will be stored at Virgin Media or Virgin Media premises until such time that they are required on site</p>	Agree with Virgin Media position.	Agreed
3.2.2	N/A	Traffic Management	<p>All Traffic Management shall be undertaken in accordance with chapter 8, Traffic Management Act.</p> <p>Any requirements over and above those laid down in Chapter 8 to be agreed on site between Highways Department and Virgin Media contractor.</p>	Agree with Virgin Media position.	Agreed
3.2.3	N/A	Ground Conditions	Virgin Media to be informed of ground conditions.	Agree with Virgin Media position.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Virgin Media Current Position	The Applicant Current Position	Status
3.2.4	N/A	Access	<p>Virgin Media personnel and contractors working on site will be instructed to observe site security and safety procedures.</p> <p>In cases of damage to Virgin Media Plant on site or emergency situations, access may be required at very short notice.</p>	Agree with Virgin Media position.	Agreed
3.2.5	N/A	Programme/Timing of Works	<p>In order for these works to be completed on agreed timescales, Virgin Media's programme has been provided to the proposed project.</p> <p>The quoted timescales are from receipt of your formal acceptance of costs and AGREED PROGRAMME OF WORKS & START DATE with appointed Site Agent.</p>	Agreed in principle - programme to be agreed and reviewed by contractor.	Under discussion
3.2.6	N/A	Monitoring & Control	<p>The project will be monitored and controlled at two separate levels.</p> <p>1. With client/contractor to ensure agreed timescales are met and to resolve on-site problems.</p> <p>Changes to this specification and Virgin Media's works can only be</p>	Agree with Virgin Media position.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Virgin Media Current Position	The Applicant Current Position	Status
			<p>authorised by the Virgin Media personnel referred to in the list of contacts in this document.</p> <p>All changes must be documented and agreed between the client/contractor and Virgin Media, within 7 days of the change.</p> <p>2. In-house Project Management in order to ensure resource allocation for continuity of work and financial control.</p>		Agreed
3.2.7	N/A	Additional or Unforeseen Works	<p>Please be aware that should the need for any unforeseen works arise, Virgin Media will re-appraise the existing budget. If the cost of the additional work is deemed to be significantly higher, Virgin Media may stop works and require additional funds prior to recommencing works on site.</p>	Agree with Virgin Media position.	

4. Approvals

Signed	
On Behalf of	Virgin Media
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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