

Sea Link

Volume 9: Examination Submissions

Document 9.64: Draft Statement of Common Ground Between National Grid Electricity Transmission and Vodafone.

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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 has been prepared to identify matters agreed and matters currently outstanding between National Grid and Vodafone. The SoCG will evolve through DCO process.
- 1.2.2 This SoCG is between the Applicant and Vodafone Group Public Limited Company (‘Vodafone’). 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).
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and Vodafone 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 This SoCG has been completed using the information provided by Vodafone and the points agreed below have been done by Email, we have submitted a copy for comment by Vodafone and we are awaiting a reply.
- 1.2.5 For the purpose of this SoCG, National Grid and Vodafone will jointly be referred to as the “Parties”. When referencing Vodafone alone, they will be referred to as “the Consultee”.

1.3 Role of Vodafone in the DCO process

- 1.3.1 Vodafone provides broadband, TV, landline and mobile services in England, Scotland and Wales. Vodafone are regulated by Ofcom and are on the register of persons with powers under the Electronic Communications Code.

- 1.3.2 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 Vodafone and National Grid.
- 1.3.3 Vodafone has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the proposed project and Vodafone 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.
- 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
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 Vodafone

Date	Topic	Discussion points
Oct – Dec 2022	Non-statutory Consultation	<i>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.</i>
Oct – Dec 2023	Statutory Consultation	<i>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.</i>
July 2024	Targeted Consultation	<i>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.</i>
18/12/2024 – 13/01/2025	Proposed project update email chain	<p><i>Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0751) issued to Vodafone. Alongside, a design interface update document named ‘SEAL-MMD-SEAL-ENG-TCN-0752’ outlining latest design for Vodafone to review.</i></p> <p><i>Response notifying Sea Link that Vodafone does have apparatus in the vicinity as well as leased and/or third parts networks within the proposed works.</i></p> <p><i>Vodafone asking for further details around the scheme, which were provided accordingly</i></p> <p><i>Vodafone then responded stating that this would fall under HSG47 and NJUG guidelines on public road. As a general guide, the minimum clearance between adjacent services should be either one and a half times the diameter of the pipe being laid or 150 mm, whichever is the greater.</i></p>
13/01/2025	Confirmation of C3 inquiry	<i>Confirmation email for contacting Vodafone C3 mailbox, “Your order is logged under the reference “010850” and also, we would like to let you know, we have the ECD of 20 working days from the date of receiving your request to return with a C3 estimate.”</i>

16/01/2025	C3 Letter Received	<p>Email of C3 response form Vodafone C3 request mailbox that included the attached document of Vodafone Plan Map and C3 Letter.</p> <p>Vodafone Plan Map confirmed the location of assets and indicated works area requiring supervision.</p> <p>C3 Letter provided a budget estimate for diversion/protection of Vodafone apparatus. Vodafone requested a supervisor present for the duration of the works, The cost for this would be £1500.00 plus VAT per day or part thereof.</p>
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3. Areas of Discussion Between the Parties

3.1 The Proposed Project and Vodafone Assets

Table 3.1 The Proposed Project and Vodafone Assets

Ref	Relevant Application Document	Summary of Description of Matter	Vodafone Current Position	NGET Current Position	Status
3.1.1	N/A	Vodafone assets in Leiston Road	<p>Vodafone Limited does own underground apparatus within the area of your proposed works, but due to the nature and location of your works this apparatus should not require diversion.</p> <p>However, should the need arise to alter the design of your proposed works, it is imperative that you contact us, at the email address above, to discuss the implications, and in particular, any increased risk to the integrity of the Vodafone duct(s) and fibre optic cable(s).</p> <p>We request that you have a Vodafone supervisor on site during your works. The cost for this would be £1500.00 plus</p>	Accept Vodafone position.	Agreed

VAT per day or part thereof. If Vodafone apparatus is found to be at risk, all work causing possible risk to the network should stop and Vodafone's diversionary requirements will be re-assessed.

If you wish to obtain a C4 detailed estimate, the cost of providing this is £2,500.00 plus VAT.

4. Approvals

Signed

On Behalf of

National Grid

Name

Position

Date

Signed

On Behalf of

Vodafone

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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