



**The Great Grid Upgrade**

Sea Link

# Sea Link

## Volume 9: Examination Submissions

Document 9.42: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership.

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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 has been prepared between the Applicant and the Suffolk & Essex Coast & Heaths National Landscape Partnership (referred to as the National Landscape Partnership). 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 will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and the National Landscape Partnership 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.
- 1.2.3 For the purpose of this SoCG, the Applicant and the National Landscape Partnership are jointly referred to as the “Parties”. When referencing the National Landscape Partnership alone, they are referred to as “the Consultee”.

## 1.3 The Role of Suffolk & Essex Coast & Heaths National Landscape Partnership in the DCO Process

- 1.3.1 The National Landscape Partnership is a non-constituted grouping of local authorities, (County, District and Parish) environmental Non-Government Organisations, representatives of the Government Agencies and membership groups representing the farming, business and tourism sectors. The National Landscape Partnership works together as an advocate for the designated landscape but individual members will enter into their own SoCG representing their full statutory responsibilities.



- 1.3.2 The term National Landscape is used as the brand for the national designation of Area of Outstanding Natural Beauty (AONB).

## 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 within the Suffolk & Essex Coast & Heaths National Landscape).

## 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 used.

- 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
AONB	Area of Outstanding Nature Beauty
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LCA	Landscape Character Area
LVIA	Landscape and Visual Impact Assessment
SoCG	Statement of Common Ground

## 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 Summary of discussions**

<b>Date</b>	<b>Topic/Format</b>	<b>Discussion points</b>
24 June 2022	<i>Introduction to the Sea Link project</i>	<i>To introduce National Grid, the Sea Link project including the need case and the consultation strategy.</i>
June 2022 – ongoing	<i>Monthly meetings with Suffolk County Council and East Suffolk Council attended by National Landscape Partnership.</i>	<i>Various project updates as the project has progressed through pre-application and subsequent pre-examination stages.</i>
24 May 2023	<i>AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, Natural England, National Landscape Partnership – Landscape and Visual thematic meeting</i>	<i>Project update since the Scoping Report was issued and non-statutory consultation closed along with clarification of various landscape and visual related points identified during Scoping.</i>
29 June 2023	<i>AECOM landscape, National Grid, Natural England, National Landscape Partnership</i>	<i>To discuss project description and AONB consideration.</i>
27 February 2024	<i>AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, Natural England, National Landscape Partnership – Landscape and Visual thematic meeting</i>	<i>L&amp;V thematic meeting to discuss the following:</i> <ul style="list-style-type: none"> <li>• Statutory Consultation feedback;</li> <li>• predicted significant effects;</li> <li>• effects on NL / Heritage Coast; and</li> <li>• design principles and landscape strategy.</li> </ul>
23 April 2024	<i>AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, Natural England, National Landscape Partnership – Landscape and Visual thematic meeting</i>	<i>The following aspects were discussed:</i> <ul style="list-style-type: none"> <li>• Project updates;</li> </ul>

Date	Topic/Format	Discussion points
		<ul style="list-style-type: none"> <li>• long distance cycling / walking routes;</li> <li>• design mitigation; and</li> <li>• co-location illustrative masterplan update.</li> </ul>
25 June 2024	AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, National Landscape Partnership – Landscape and Visual thematic meeting	Landscape and Visual thematic meeting to discuss previously issued meeting material from May and June 2024 and Public Rights of Way diversions.
20 September 2024	AECOM landscape, National Grid and National Landscape Partnership – to discuss s85 requirements	<p>The following aspects were discussed:</p> <ul style="list-style-type: none"> <li>• Project updates;</li> <li>• Design Panel Review;</li> <li>• Landscape mitigation in the AONB; and</li> <li>• Approach to s85 requirements and securing parcel of land for enhancement within the Order Limits.</li> </ul>
30 October 2024	AECOM landscape, National Grid and National Landscape Partnership – to discuss s85 requirements.	Meeting to provide updates on the parcel of land for acid grassland enhancement because of landowner discussions.
19 November 2024	AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, National Landscape Partnership – Landscape and Visual thematic meeting	Landscape and Visual thematic meeting to discuss previously issued material, landscape mitigation design and targeted consultation comments.
8 January 2025	AECOM landscape, National Grid, Suffolk County Council, East Suffolk Council, National Landscape Partnership – Landscape and Visual thematic meeting	Landscape and Visual thematic meeting to discuss areas of agreement to inform the SoCG and landscape mitigation plans.
17 June 2025	Meeting to discuss the points raised in their Relevant Representations	Project Update, Structure of the Statement of Common Ground and the key concerns raised by the National Landscape



Date	Topic/Format	Discussion points
28 August 2025	<i>Meeting to discuss the Acid Grassland Enhancement</i>	<i>Partnership in their Relevant Representation.</i>  <i>Meeting to discuss Natural England and the National Landscape Partnership Relevant Representations as well as S85 Enhanced Duty and Acid Grassland Enhancement.</i>

### 3. Areas of Discussion Between the Parties

#### 3.1 Suffolk & Essex Coast & Heaths National Landscape

Table 3.1 Suffolk & Essex Coast & Heaths National Landscape

Ref	Relevant Application Documents	Summary of Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.1.1	<b>Application Document 7.1 Planning Statement</b>	How section 85 of the Countryside and Rights of Way Act has been met in developing the proposals.	<p>Noting the NLP’s comments on first paragraph of application the position of the NLP is:</p> <p>The National Landscape Partnership welcome the provision of circa 6 ha of acid grassland that it considers contributes to the statutory purpose of the National Landscape. This provision demonstrates the applicant acknowledging the Suffolk &amp; Essex Coast &amp; Heaths Management Plan 2023-28 and in part its demonstration to seek to further the purpose of the AONB in its decision making. Where the National Landscape Partnership’s opinion diverges from the applicant’s view relates to its view that the proposal may not be considered to fully mitigate the impacts of the construction phase.</p>	<p>The strengthened duty requirement is explained in detail within Section 1.2 of <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b> and the proposals relating to this are set out within <b>Application Document 7.1 Planning Statement [AS-057]</b> from paragraph 7.3.21 onwards with specific reference to the Natural Beauty Indicators and Special Quality Indicators set out in the document: Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Quality Indicators v1.8 (LDA Design, November 2016).</p> <p><b>Application Document 7.1 Planning Statement [AS-057]</b> (Section 7.3 and Appendix F) provides information relating to the Section 85 of the Countryside and Rights of Way (CRoW) Act 2000 requirements. This includes the provision of an area of land (circa 6 ha) within the Order Limits for delivering acid grassland enhancement located to the south of the A1094.</p> <p>The land identified in the Order Limits for this enhancement is much larger than 6 ha to provide flexibility over how and where enhancement can be delivered as part of the detailed design. The area of the AONB within the Order Limits currently comprises arable and modified grazing land in the northern part and a mosaic of acid grassland, bracken, gorse scrub and birch woodland in the southern part.</p> <p>The enhancement of an area of acid grassland is secured through <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b> which in turn is secured through Requirement 6 of <b>Application Document 3.1 Draft DCO [AS-087]</b>.</p> <p>There have been a number of meetings with the National Landscape Partnership to discuss compliance with Section 85 of the CRoW Act relating to furthering the purposes of the AONB (including 30 September 2024, 30 October 2024 and more recently 28 August 2025). The earlier meetings led to the inclusion of a section within the Planning Statement setting out the relationship of the acid grassland enhancement with the AONB Management Plan and special qualities, rather than solely being dealt with within the landscape chapter.</p> <p>During a meeting held on 30 September 2024 with the National Landscape Partnership, a number of topics were discussed relating to the Landscape and Visual Impact Assessment (LVIA) but also specifically on Section 85 compliance through introduction of a parcel of land within the Order Limits for acid grassland enhancement. Natural beauty indicators and the AONB Management Plan objectives were discussed at this meeting. The introduction of an area of acid grassland enhancement was seen as positive by the National Landscape Partnership. The National Landscape Partnership expressed their concerns that at construction there may be areas of land within the AONB not able to deliver the statutory purpose and that both parts of the duty (to conserve and enhance) should be addressed.</p>	Under discussion

Ref	Relevant Application Documents	Summary of Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>A subsequent meeting was held on 30 October 2024 to communicate the change in the acid grassland parcel due to landowner challenges. The project team explained that the proposed area for acid grassland enhancement forms one part of the Section 85 requirements and, as the previous site, the proposals would align with the AONB Management Plan and special qualities of the AONB to contribute to the furthering of the purposes. The National Landscape Partnership agreed the proposals go some way to meeting the requirements to avoid harm and that the Proposed Project was going above and beyond with this exercise.</p> <p><b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b> has a specific section on 'Acid grassland reinstatement' (Section 4.2) which sets out the methodology and management period of 10 years to address the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete, and the HDD compound and haul road are removed. There is also further information on the acid grassland reinstatement and enhancement within Sections 5.3, 6.7 and 6.13.</p> <p>The Applicant has issued further detail on such matters to Natural England in relation to the Section 85 compliance and effects on the AONB, specifically relating to acid grassland enhancement. Discussions are ongoing with the National Landscape Partnership, Natural England and the landowner to identify an appropriate 6 ha of acid grassland enhancement within the wider area identified in the Order Limits. The Applicant's response to the Section 85 requirement is fully encapsulated in <b>Application Document 9.47 National Landscape Section 85 Duty Technical Note</b> to be submitted at Deadline 1.</p>	
3.1.2	<b>Application Document 7.1 Planning Statement</b>	How the statutory Suffolk & Essex Coast & Heaths National Landscape management plan 2026-31 has been considered during the development of these proposals.	<p>The National Landscape Partnership recognise the efforts the applicant has made to consider the Suffolk &amp; Essex Coast &amp; Heaths National Landscape Management Plan 2023-28</p> <p>The National Landscape Partnership would wish to see explicit reference to how the applicant would meet the fifth bullet of the Landscape Management Plan Policy: 'Proposals that are likely to impact on the dark skies of the AONB should have regard to these dark skies by seeking to avoid and minimise light pollution' (p52 of the Suffolk &amp; Essex Coast &amp; Heaths National Landscape Management Plan 2023-28) during the construction phase.</p>	<p>The Suffolk &amp; Essex Coast &amp; Heaths AONB Management Plan 2023-28 has been used to inform the landscape baseline and assessment as well as in developing the additional mitigation areas to inform compliance with the Section 85 requirements. Specifically, <b>Application Document 7.1 Planning Statement [AS-057]</b> sets out in paragraph 7.3.24 how the enhancement area is considered to contribute to the aspirations set out in the Management Plan, including nature recovery and local distinctiveness.</p> <p>The Proposed Project has specifically avoided and minimised light pollution in the AONB by having no permanent infrastructure either located in or within the setting of the AONB thereby negating the requirement for any permanent lighting requirements. During construction there may be a need for localised task lighting at the landfall compound due to the requirement for 24hr continuous construction activity associated with the cable jointing and trenchless drilling. These temporary lighting requirements would be designed to relevant guidance and standards, including the International Commission on Illumination (CIE) guidance documents to minimise sky glow and effects of obtrusive light. Where construction within the AONB does not require 24hr activities such as construction of the HVDC cable corridor, temporary lighting will not be required thereby further limiting effects on the dark skies of the AONB.</p>	Under discussion
3.1.3	<b>Application Document 6.2.2.13 Part 2</b>	How the Applicant has coordinated with other energy projects impacting the Suffolk &	The National Landscape Partnership recognise that Table 13.35 Assessment of total	<b>Application Document 7.10 Coordination Document [APP-363]</b> sets out how the Proposed Project has coordinated with other energy projects in Suffolk.	Under discussion

Ref	Relevant Application Documents	Summary of Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	<b>Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>	Essex Coast & Heaths National Landscape (proposed, consented, under construction and operational) to reduce impacts on the designated landscape.	<p>cumulative effects for Landscape and Visual of APP 060 includes the following: Overall assessment of cumulative effects with all projects:</p> <p>When considered together there is likely to be an intensification of the cumulative effects that were reported separately for each of the other developments during the construction and decommissioning stages on the Suffolk Coasts [Sic] and Heaths AONB and Suffolk Heritage Coast. There is no additional mitigation available to address this intensified cumulative effect, which remains <b>significant</b> during construction and decommissioning. No significant cumulative effects anticipated for operation and maintenance</p> <p>The National Landscape Partnership acknowledge this assessment of impacts on the National Landscape during the construction phase.</p>	Other relevant projects impacting the AONB have been fully assessed as part of the landscape and visual cumulative assessment ( <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter- Project Cumulative Effects [APP-060]</b> ). This includes consideration of Sizewell C, East Anglia ONE and TWO offshore windfarms and LionLink. This document also provides a sequential cumulative visual assessment of key routes within the AONB within Table 13.36.	
3.1.4	<b>Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>	How the Applicant has assessed the impacts on the defined Natural Beauty indicators (Landscape Quality, Scenic Quality, Relative Wildness, Relative Tranquillity, Natural Heritage Features, Cultural Heritage) and Special Qualities on the National Landscape.	The National Landscape Partnership acknowledge that the assessments in APP-097 are classified as not significant although the proposed project would affect localised tranquillity within the AONB is defined as minor adverse (page 3).	<p>The landscape assessment, as reported in <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment - Suffolk [APP-097]</b> is presented for the specific Suffolk &amp; Essex Coast &amp; Heaths AONB Indicators within Table 2.1. The headings are split into the natural beauty indicators in the assessment table, such as 'scenic quality' but assess against the baseline specific to the Suffolk &amp; Essex Coast &amp; Heaths AONB. For example, in this section the long distance and panoramic views are spoken about which relate specifically to the AONB as set out in <b>Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]</b> within Table 1.1 Suffolk &amp; Essex Coast &amp; Heaths AONB Indicators. This is undertaken at the various project stages, including construction, operation and maintenance (year 1 winter) and operation and maintenance (year 15 summer).</p> <p>The Special Quality Indicators of the AONB, as set out in Table 1.2 in <b>Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]</b> are not all relevant to landscape and visual matters, including economy and health and well-being. Therefore, an additional assessment has been undertaken for each of these indicators and is presented within Appendix F of <b>Application Document 7.1 Planning Statement [AS-057]</b>.</p>	Under discussion
3.1.5	<b>Application Document 6.4.2.1 Figures Suffolk</b>	How development in the setting of the National Landscape is impacting the Natural Beauty indicators (Landscape Quality,	The National Landscape Partnership acknowledge the assessments in APP-097 that the project proposals have been	The assessment of the setting of the AONB is discussed within the consideration of effects on the AONB contained within Table 2.1 of <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment - Suffolk [APP-097]</b> . For example, the assessment takes into account the cable laying barge operations,	Under discussion



Ref	Relevant Application Documents	Summary of Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	<b>Landscape and Visual Part 1 of 7 (Figure 8)</b>	Scenic Quality, Relative Wildness, Relative Tranquillity, Natural Heritage Features, Cultural Heritage) and Special Qualities of the National Landscape.	assessed as not having a significant affect on the setting of the AONB.	<p>which would occur out with the AONB but would result in a potential effect during the construction period and relates this to the relevant natural beauty indicator and discusses how this affects the magnitude of effect in relation to those specific Suffolk Coast and Heath AONB indicators.</p> <p>To note also that the Proposed Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process, this included the decision to site the proposed converter station away from the AONB to limit effects on its setting.</p>	

# 4. Approvals

Signed	
	
On Behalf of	Suffolk & Essex Coast & Heaths National Landscape Partnership
Name	Simon Amstutz
Position	National Landscape Manager
Date	25 Nov 2025

Signed	
On Behalf of	NGET
Name	
Position	[senior consents officer/lead project manager/ lead project director]
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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