The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

Document 7.4.13: Draft Statement of Common Ground Between National Grid Electricity Transmission and the UK Chamber of Shipping

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)

nationalgrid

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Date	**Version**	**Status**	**Description / Changes**
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1
January 2026	C	DRAFT	Issued to PINS for Deadline 3
March 2026	D	DRAFT	Issued to PINS for Deadline 5

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.

1.1.1 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.

1.1.2 This SoCG has been prepared between the Applicant and UK Chamber of Shipping (UKCoS). 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 This Statement of Common Ground

1.2.1 This SoCG has been prepared to identify matters agreed and matters currently outstanding between The Applicant and the UKCoS. The SoCG will evolve as the DCO application progresses through examination.

1.2.2 An early draft SoCG was prepared by the Applicant to submit with the DCO application, based on engagement with UKCoS throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with UKCoS to resolve issues as the project progresses through the Pre-Examination and Examination phases.

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

1.3 Role of the UK Chamber of Shipping in the DCO Process

1.3.1 The CoS is the trade association for the UK shipping industry, representing 200 members, operating 900 vessels equalling 18 million gross tonnes in capacity, across all vessel sectors globally and around the UK. The CoS' interest lies in ensuring the impact to navigational safety, commercial operation, and environmental efficiency are avoided or minimised as far as possible.

1.3.2 The Consultee works with parliament, international organisations, local authorities and others to champion and protect the shipping industry on behalf of its members. The Consultee has a direct influence on matters relating to the shipping industry and seeks to ensure that protections are in place to avoid adverse harm, whether these be from policy and legislation, major infrastructure projects and other factors.

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 the Applicant 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 The Applicant owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, the Applicant holds a transmission license 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 400kV overhead line close to Richborough in Kent.

1.4.4 the Applicant also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires license holders, in the formulation of proposals to transmit electricity, to:

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

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."

1.4.5 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 (2 m allowance for ground level rise plus 26 m converter station) 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.

1.4.6 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.

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

Table 1.1. Abbreviations.

Abbreviation/Term	Definition
AIS	Automatic Identification System
CoS	Chamber of Shipping
DCO	Development Consent Order
DoL	Depth of Lowering
EIA	Environmental Impact Assessment
FE	Five Estuaries (Offshore Wind Farm)
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IMO	International Maritime Organisation
NIP	Navigation and Installation Plan
NF	North Falls (Offshore Wind farm)
NRA	Navigation Risk Assessment
SoCG	Statement of Common Ground
TDoL	Target Depth of Lowering
TJB	Transition Joint Bay
TSS	Traffic Separation Scheme
UKC	Under keel clearance

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 prior to submission of the DCO application.

Table 2.1 Pre-application discussions

Date	Topic	Discussion points
20 to 25 October 2022	*Series of emails to introduce the proposal and discuss meetings and consultations.*	*Main concerns with proposal pre-Scoping. The Applicant confirmed when EIA scoping report was to be submitted and when non-statutory consultation would be taking place. The Applicant agreed to send UKCoS the Scoping for review and to add UKCoS to any stakeholder meetings.*
24 April 2023	*Shipping and navigation consultation and Hazard workshop*	*Consultation meeting with Statutory Navigational Bodies. Presented initial results from Navigational Risk Assessment and conducted Hazard workshop to identify potential shipping and navigation impacts.*
26 July to 16 August 2024	*Shipping and navigation – PEIR review. (series of emails)*	*UKCoS raised their main concerns regarding the NRA within the PEIR. These concerns were related to the following:* • *Duration of construction period – particular disruption to IMO Routeing Measures and increased collision risk* • *Impact upon UKC and necessity to future proof to allow for 20m draft vessels to access Harwich, therefore a minimum of 22m below Chart Datum is required.* • *Interaction and alignment with other cables in the area for example Five Estuaries*

2.2 Summary of post-application discussions

2.2.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties after the submission of the DCO application.

Table 2.2 Post-application discussions

Date	Topic	Discussion points
March 2025	*UK CoS review of SoCG*	*UK CoS comments on SoCG document*
20 June 2025	*Teams meeting on SoCG*	*Discussion points including Navigation and Installation Plan (NIP), under-keel clearance, cable joints, Sunk Traffic Separation Scheme (TSS), cable burial and protection.*
23 June 2025	*UK CoS Relevant Representation*	*Role of UKCoS, importance of ports and shipping industries, routeing to minimise disruption and economic loss, IMO Routeing Measures, deep water routes, other cables, under keel clearance, cable burial and protection plans, installation risks.*

3. Areas of Discussion Between the Parties

3.1 Shipping and Navigation

Table 3.1 Shipping and Navigation

Ref	Relevant Application Document	Summary of Description of Matter	UKCoS Current Position	The Applicant's Current Position	Status
3.1.1	**Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**	Main shipping and navigation risks	Noting the busy marine space of the Southern North Sea and the variety of offshore renewable projects in the area, the Consultee requested to learn more about the Proposed Project, the planning schedule and possible interaction with shipping, in particular reduction in under keel clearance and possible snagging risk.	These aspects are assessed in Section 7.6 of the **Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Agreed
3.1.2	**Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Reputational Risk	With Hazard Logs there is often a business/reputational consequence column as well. E.g an oil tanker involved in a collision is a big risk to safety of vessel and crew (with severe reputational risk), Would like to see reputation to business risk included within this hazard log. This is customary for NRA.	As requested, **Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.has been revised to include explicit references to both environmental and commercial risks.	Agreed
3.1.3	**Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Alignment with other projects	The Consultee is concerned about the interaction and alignment with other cables in the area, eg Five Estuaries, North Falls, etc. and the impact this could have on the Proposed Project. The production of a Navigation and Installation Plan (NIP) is welcomed by the UK CoS.	Communications with other projects is noted by the Applicant. The Project has engaged with and will continue to engage with other cables projects including Five Estuaries to reduce impacts and in order to coordinate as far as practicable marine activities which may overlap in time. The Applicant is producing a NIP to keep relevant stakeholders are informed throughout the project construction phase and enable collaboration with other offshore developments. This is also noted in Section 7.6 of the **Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**. The Applicant submitted a draft Outline NIP to PINS on 1 September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.	Agreed
3.1.4	**Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Duration of Construction period	The Consultee is concerned about the duration of the construction period, in particular, disruption to IMO Routing measures and increased collision risk. The Consultee wishes to know if there are cable joints planned within the Sunk TSS.	This concern has been noted. The project has committed to mitigating collision risk and avoiding disruption to the Sunk anchorage area and Sunk pilot boarding area (within the Sunk TSS) during construction by minimising time spent in this region during construction and avoiding cable joints in these areas where possible. This is discussed in **Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	UKCoS Current Position	The Applicant's Current Position	Status
				The Applicant clarifies that no cable joints in the Sunk TSS are planned, and this has also been communicated to the construction contractors. The Applicant can share where cable joints are planned in due course.	
3.1.5	**Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**.	Impact on UKC and approaches to ports	The Chamber is concerned about the impact upon UKC and the necessity to future proof to allow for 20 m draft vessels to access PLA and HHA waters. The Consultee has confirmed that this is a requirement therefore for a minimum water depth of 22 m below Chart Datum to be preserved. The Chamber welcomes the additional analysis the Applicant has undertaken regarding UKC by way of the Certified Plan of the Areas of Safeguarded Water Depth, which identifies three Areas of Safeguarded Water Depth outlined by the Port Authorities. The Chamber notes their presentation in further detail within the Outline Cable Specification and Installation Plan, and the Applicant's commitment to this Plan under Condition 4-(a) of the dML. The Chamber understands that HHA and PLA wish for the agreed depths to be secured through a DCO Requirement, rather than through the dML to ensure a public procedure with greater representation and protection. The Chamber therefore aligns itself with PLA and HHA in requesting that variation be secured via DCO rather than the dML as presently suggested.	These main concerns are noted and addressed in the in Section 7.6 of **Application Document 6.3.4.7A (C) Navigational Risk Assessment [REP4-047]**. In line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5% along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a very small number of locations, which are anticipated to be located close into shore. Any anticipated areas where reductions in water depth may be greater than 5% will be discussed with relevant stakeholders including port and harbour authorities. This commitment is current secured under Condition **4-**(6) of the dML. Regarding Deep Water Routes, the Applicant confirms that the Sea Link cable route does not intersect with either the "Sunk Deep Water Route" or the "Trinity Deep Water Route". The request to preserve a minimum water depth of 22 metres (+ 0.5 m over dredge) below Chart Datum has been discussed with Harwich Haven Authority, the Port of London Authority (PLA) and London Gateway Port. It has been established that the geographical area for this requirement is the PLA's Area of Safeguarded Depth named "Sunk Pilot Boarding area". The Applicant agrees with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities and described in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**. The Applicant has assessed the engineering implications of these requirements, specifically the additional cable Depth of Lowering (DoL) that may be necessary in parts of the "Sunk Pilot Boarding Area" where depths are already less than the 22 m CD safeguard level. Following on from Issues Specific Hearing 2 and Deadline 4, the Applicant confirms that **Application Document 9.104 Areas of Safeguarded Water Depth Plan [REP4-098]** has been submitted.	23/2/26 Under discussion – significant progress but until such time as agreement is reached with PLA & HHA to their satisfaction, the matter remains under not resolved for the CoS.

Ref	Relevant Application Document	Summary of Description of Matter	UKCoS Current Position	The Applicant's Current Position	Status
				The future dredging depths for the three Areas of Safeguarded Water Depth outlined by the Port Authorities are currently presented in **Application Document 9.92 Outline Cable Specification and Installation Plan [REP4-090]**, and the Applicant has secured its commitment to this Plan under Condition **4-**(a) of the dML.	
3.1.6	**N/A**	Cable Burial & Protection	The Consultee raises the matter of cable burial & protection plans in particular relevant to anchor snagging risk; and installation leading interaction with commercial routeing and associated risks.	The primary cable protection methodology is lowering to Target Depth of Lowering (TDOL). The high-level factors determining the proposed TDOL are as follows:- • Anchor Strike Risk (ASR); the DOL in areas where there is the highest ASR the recommended DOL is derived to be deeper than the Anchor penetration • Vessel traffic, fishing, and marine use; areas where there are higher levels and volumes of traffic, require that the recommended depth of lowering is increased to reduce risk to the cable. • Sediment types, distribution, and inherent protection capacity; where the sediment provides poor protection at the minimum recommended TDOL, the depth of lowering is increased High Risk Areas of the route (e.g through the Sunk TSS) will be backfilled using rock (below the original seabed level) along its entire length at the earliest opportunity. The draft Cable Burial Risk Assessment which has been submitted to PINS provides further insight into burial and protection plans.	Agreed
3.1.7	**N/A**	Decommissioning	The Consultee is interested in the decommissioning programme and plans.	Future requirements and associated timescales for decommissioning of the Proposed Project are not currently known. The current predicted operational life of the marine cables is between 40 and 60 years. However, it is not known at this stage whether the Proposed Project will be decommissioned at that point or whether options for extending the life of the project will also be explored. As stated in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**, an Initial Decommissioning Plan will be prepared post consent in accordance with all legislation, best practice guidance and policy applicable at the time of compilation. However, as decommissioning of the cable would be many decades into the future, regulatory requirements and industry best practice may change. Dependent on	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	UKCoS Current Position	The Applicant's Current Position	Status
				requirements at end of asset life, the redundant cables could either be recovered for recycling (in their entirety, or in parts), or left in-situ, if that has less environmental impact. As set out in Requirement 13 in Schedule 3 of **Application Document 3.1 (G) Draft Development Consent Order [REP4-217]** the initial decommissioning programme will be submitted to the Marine Management Organisation for approval at least six months prior to the commencement of any decommissioning works. The Initial Decommissioning Programme will be updated throughout the life of the project in preparation for decommissioning. At this point the proposed approach to decommissioning and associated impacts will be assessed in detail. These assessments will be informed by detailed surveys and will consider decommissioning methods that are available at the time, including future techniques for the removal of cable protection.	

4. Approvals

Signed	

On Behalf of	National Grid
Name	
Position	
Date	

Signed	

On Behalf of	UK Chamber of Shipping
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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