The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.65: Draft Statement of Common Ground Between National Grid Electricity Transmission and the National Trust.

Planning Inspectorate Reference: EN020026

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Date	**Version**	**Status**	**Description / Changes**
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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 matter's 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 National Trust. 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 National Trust 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 National Trust are jointly referred to as the "Parties". When referencing National Trust alone, they are referred to as "the Consultee".

1.3 The Role of National Trust in the DCO Process

1.3.1 National Trust is a charity and Europe's largest conservation organisation, with a current membership of over 5 million people. National Trust are responsible for protecting and caring for places of historic interest and nature beauty in England, Wales and Northern Ireland. Within the Southeast area, this includes a wide range of publicly accessible properties. Of relevance to this consultation is Pegwell Bay.

1.3.2 The National Trust owns land at Pegwell Bay, which forms part of a wider landholding within the Sandwich and Pegwell Bay area. Pegwell Bay is located to the south of Ramsgate and is included within the Order Limits of the Proposed Project.

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 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. 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.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
HDD	Horizontal Directional Drilling

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 National Trust

Date	Topic/Format	Discussion points
06/09/2021	*Project update/ Email*	*Email to provide an update on the progress of the Proposed Project.*
Jan 2025	*Site Visit*	*Proposal for the project*
Oct 2024	*Teams Presentation*	*Presentation on use of Pegwell bay and hoverport and HDD Methodology. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.*
26/06/2025	*Horizontal Directional Drilling (HDD) on the National Trust's land / Microsoft Teams*	*Discussion of the impact of the HDD on the National Trust's land / interest and wider potential scheme impacts generally.*
11/02/2026	*Pegwell Bay Construction Method Technical Note* *Microsoft Teams*	*Discussion on the Ecological and Geological impacts in Pegwell Bay and Deadline 3 responses.*

3. Areas of Discussion Between the Parties

3.1 Position of the Parties

Table 3.1 Position of the Parties

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Chapter 2	Horizontal Direct Drilling (HDD) Impacts on Ecological designations on National Trust Land	The National Trust does not object to the principle of the proposed offshore high voltage direct current link between Suffolk and Kent with onshore converter stations and connections back to the national electricity transmission system. We would support the developer's use of Horizontal Directional Drilling (HDD) construction methods at Pegwell Bay and would expect to see a firm commitment to undertake this form of engineering if this proves to be less detrimental than other alternatives. The entry point for the HDD is 470m west of the SAC/SPA/SSSI and Trust land. It is proposed to drill at 15-18m depth under the saltmarsh, and the exit point will be to the east of the saltmarsh in intertidal mudflat (Figure 6.4.4.2.4 Habitats present at, and location of, trenchless solution entry/exit points). However, the method statements do not rule out the need for trench installation if HDD proves to be difficult/impossible to use. If trenchless techniques are used, the Trust would have concerns due to the potential of the cumulative impacts on the Nature Reserve arising due to the possibility of the proliferation of cables installed previously for the Nemo link. Consequently, the Trust would want assurances that there will be nothing above ground on our land. The Trust welcomes the Applicant's confirmation. The Trust seeks in addition that the Applicant completes an HDD Management Plan after first consulting with the Trust and other relevant stakeholders.	The current draft DCO prohibits cable installation in Pegwell Bay using techniques that are not trenchless to cross the sensitive saltmarsh. If other than a trenchless technique were proposed at this location, any proposals for alternative methods would require a formal amendment to the DCO and would need to be supported by an additional environmental assessment. However, as outlined in **Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321**], ground investigations have confirmed suitable drilling conditions for HDD. The report states that initial hydrofracture modelling, using ground strength parameters from the ground investigations, shows a 2.8 factor of safety against frac out. This means that the drilling fluid pressure would need to be 2.8 times the pressure required to drill through the formation, to cause a surface frac out in the SSSI. Therefore, there is a very low risk of frac out. The Applicant can confirm that the HDD contractor will produce a detailed, drilling fluid management plan to be approved by the MMO in consultation with relevant stakeholders including Natural England, that includes drilling fluid breakout mitigation measures, where HDD is proposed. This is currently secured within the Deemed Marine Licence through **Application Document 9.92 (A) Outline Cable Specification and Installation Plan [REP4-090]** submitted at Deadline 4, **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]**, and also within **Application Document 9.84 (B) Register of Environmental Actions and Commitments [REP4-234]**) under **B59.** In addition to the above, a HDD Landfall Method Statement will be developed following detailed design which is currently secured within the Deemed Marine Licence through **Application Document 7.5.2 (A) Outline Offshore Construction Environmental Management Plan [APP-339]**. The National Trust will be consulted on this document. A list of relevant securing mechanisms for the Proposed Project is provided in Appendix A. In addition to this, a cross sectional image	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				of the HDD exits in the intertidal at Pegwell Bay are presented in Appendix B.	
	Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]	HDD Impacts on Ecological designations on National Trust Land	It is noted that by far the longest section of cable on Trust land is some 1.5km in length and documents submitted to the examination refer to impacts upon benthic fauna and their capacity for rapid recovery following disturbance. However, there does not appear to be any reference in the paperwork to the disturbance effect on wintering, migratory and breeding birds from the cable laying operation across the 1.5km of intertidal mudflat. The significance of any impact will be dependent on the time of year the cable laying takes place with the period of September to April being the most significant, with implications for breeding Ringed Plover which will use the mudflats for feeding. The Trust remains concerned of the potential ecological impact on the inter-tidal habitat and seeks the following commitments: 1) That the presence of an Ecological Clerk of Works (ECoW) is provided at all stages of the intertidal work. The ECoW should be suitably qualified to monitor birds and intertidal ecology to advice on day-to-day matters aswell as to the quality of the restoration of the mudflat following cable laying. The Applicant to fund a post-construction bird and habitat monitoring programme for five years following construction. It should cover both the saltmarsh and the offshore intertidal. 2) Completion of an Intertidal Management Plan and Intertidal HRA following consultation of drafting from the Trust	Further clarification on works within the intertidal area in Pegwell Bay has been described in **Application Document 9.13 (C) Pegwell Bay Construction Method Technical Note [REP4-229].** The construction activities at landfall which include trenchless activities (e.g., HDD), machinery (use of a cable lay barge (CLB) which might become beached on the mudflats, excavators (up to four) and other construction plant and vehicles e.g. tractors and argocats) and vessel movement in the intertidal area and shallow waters at landfall, will potentially result in disturbance to, and displacement of, waterbirds due to the noise and visual disturbance generated by the activities, as described and assessed in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** superseded by **Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003].** The noisiest operations (i.e. vibratory piling (up to 119 dB LAmax) required for installation of the cofferdams at the HDD exit pits), are predicted to fall below the 60 dB disturbance threshold beyond approximately 350 m, while key foraging and roosting sites for waterbirds (including wintering migratory birds such as, golden plover, cormorant, and sanderling), are at least 350–500 m from the works. Visual disturbance may extend up to 500 m, but this is limited by distance, the short duration of works, and the timing of construction, which is scheduled for Quarter 2 and 3 of 2027 when waterbird numbers are lower following the mid-winter peak. Given the distance from sensitive roosting areas, the restricted spatial and temporal extent of works, and the low numbers of birds likely to be affected at any one time, the overall effect on waterbirds (wintering and breeding) is predicted to be minor and temporary and not significant. Breeding bird surveys undertaken in 2023 and 2024 at both landfall locations did not record the presence of any breeding birds, notably waterbirds or seabirds, which could interact with the marine elements of the Offshore Scheme, including the intertidal area and both landfall locations. Further details on breeding bird assemblages relevant to the wider Proposed Project are set out in **Application Document 6.2.3.2 (E) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP4-221], Application Document 6.3.2.2.C Appendix 2.2.C Suffolk Breeding Bird Report [PDA-027], Application Document 6.3.3.2.D Appendix 3.2.D Breeding**	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				Bird Survey Report 2023 [REP1A-019], and **Application Document 6.3.3.2.E (B) Appendix 3.2.E Breeding Bird Survey Report 2024 [REP1A-019]**. The Applicant confirms that it has committed to using an ECoW during intertidal works. This is currently secured within the Deemed Marine Licence through **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** and also within **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234**] under **GG04.** A Habitat Regulations Assessment (HRA) (**Application Document 6.6 (F) Habitats Regulations Assessment Report [REP4-057])** has been completed and submitted for the whole project, including the intertidal designations at Pegwell Bay. A separate Intertidal HRA is therefore not required. The Applicant confirms that it has updated commitment **B59** within the Register of Environmental Actions and Commitments to include the provision for the National Trust to be consulted on the Landfall Method Statement prior to commencement of HDD activities (**Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]**) in Pegwell Bay. The Applicant also confirms that all activities at the Landfall are captured within **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** already submitted as part of the Application. A separate Intertidal Management Plan is therefore not required at this stage. An update to this document was submitted at Deadline 4A alongside **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]** to ensure all marine commitments are captured and secured appropriately. A list of relevant securing mechanisms for the Proposed Project is provided in Appendix A. The Applicant is currently reviewing its mitigation measures proposed for Pegwell Bay and will provide an update at Deadline 5. Following on from ISH2, the Applicant has reviewed the Nemo Link Interconnector Year 3 Post-Construction Intertidal Technical Report (CEAPEG0820). The results from this report agree with the conclusions of the Sealink assessment with regards to impacts to the intertidal mudflats. The report states that 'f*ollowing an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities*	

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				in 2020'. Furthermore, the monitoring report also states *'Data collected during the year-one and year-three post-construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey'.* These conclusions agree with the Proposed Projects Benthic Ecology assessment **Application Document 6.2.4.2 (D) Part 4 Marine Chapter 2 Benthic Ecology [REP4-029]** which states '*due to the temporary and limited footprint compared to wider available area of habitat, and the understood ability for infaunal species associated with intertidal mudflat to exhibit rapid recovery to disturbance (McQuillan, et al., 2024; Tillin, et al., 2024), the physical disturbance and/or temporary loss of this habitat is predicted to be of small magnitude..... has been assessed as having a small magnitude which results in a minor effect, which is not significant'.*	
		Minster Converter Station mitigation	We note that the proposal includes a Converter Station that measures 200m x 300m and 26m in height. However, because of the low lying and relatively flat landscape coupled with a scrub covered bund situated on slightly higher ground and located between the site and Pegwell Bay, the Converter Station will not be perceptible. Despite this there remains some concern regarding the potential future impact caused by: • The scrub vegetation which is responsible for screening the structure from the Bay located beyond the ownership control of the applicant and its presence in perpetuity is therefore not assured. • The Converter Station will be seen in views from Ramsgate to the northeast from where it will be seen in relation to the Trust's property at Pegwell Bay. • The raised bund is potentially at risk of being eroded away. As such and to protect the Trust's property at Pegwell Bay it is recommended that the examination authority consider carefully these impacts and suggested mitigation as part of the overall consideration of the	**Figure 6.4.3.1.7: Representative Viewpoint Locations and Screened Zone of Theoretical Visibility** within **Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Part 1 of 4 [APP-240]** illustrates the theoretical visibility of the proposed Minster Converter Station and Minster Substation in the landscape and visual study area. The height of the proposed Minster Converter Station would be 28m in height. This figure demonstrates that there would likely be intervisibility between the proposed Minster Converter Station and Minster Substation from parts of the National Trust's land holding. Viewpoint 7 along Sandwich Bay is located within this area where there is potential intervisibility (detailed within **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**). This reports that views of the proposed Minster Converter Station and Minster Substation are unlikely due to intervening vegetation. The LVIA has been undertaken using current baseline information with regard to landform and vegetation. The 'Future Baseline' section within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** sets out that trees, woodland, scrub and riparian habitats will continue to mature but the inherent character and the contribution that they make to views and visual amenity is unlikely to substantially change. Viewpoints 13 and 14 represent receptors on the edge of Ramsgate. Any views available towards the operational Minster Converter Station and Minster Substation would likely be limited to the upper extents due to intervening screening features. The views	Under discussion

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			visual impact of the Converter Station on the wider landscape. The Trust welcome the approach taken by the Applicants in the preparation of an outline landscape strategy which provides for a collaborative approach to delivering landscape and ecological mitigation. The Trust would need to be consulted on the delivery of this mitigation through a detailed Landscape and Ecological Management Plan – Kent.	would typically include part of the coastal landscape at Pegwell Bay however would also be within the context of residential development within Cliffsend and existing energy infrastructure. Regarding mitigation, an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and ecological mitigation (**Application Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Kent [REP4-067]** and within this **Application Document 7.5.7.2 Figure 1 Minster Converter Station and Substation Outline Landscape Mitigation)**.	
		Construction methods and mitigation	Given the potential impact this proposal could have on the significant nature designations at Pegwell Bay, the National Trust request more in-depth details on the construction and design methods than would usually be available during the Development Consent Order (DCO) process, so that we can be reassured that the works proposed will provide the highest level of mitigation possible. The National Trust would encourage the developer to consider additional mitigation in the form of funding to support the ongoing management and future conservation of important coastal and marine species and habitats in the Pegwell Bay and Sandwich Bay SAC area and would welcome further discussion on this topic during the DCO process with the National Trust as landowner, the Kent Wildlife Trust as site manager and other key stakeholders. The Trust considers there remains significant areas of uncertainty around the details of construction and potential ecological impacts. The includes, but is not limited to the impact of x4 ducts running through the SSSI intertidal habitat (requiring a 80m and not 30m wide easement) which the applicant has recently advised the Trust within the last week. It is not clear to the Trust how the applicant has applied the mitigation hierarchy in relation to impacts on the Sandwich Bay to Hacklinge Marshes SSSI. The location of the exit points are not clear. It would be clear if these are shown on a location plan with the pits dimensionally referenced (horizontally and vertically) to the MHWS and MLWS. Its also not clear if the exit pits will comprise a permanent buried construction of if they are simply locations within the cofferdams at the HDD/duct installation and subsequently the cable installation. The detailed specifications for the HDD	Further project description information in regard to Pegwell Bay construction activities is available in **Application Document 9.13 (C) Pegwell Bay Construction Method Technical Note [REP4-229]** As presented in **Application Document 6.2.4.1 (E) Part 4 Marine Chapter 1 Physical Environment [REP4-027],** at Pegwell Bay, the magnitude of the impact on nearshore physical processes morphology due to the excavation of the HDD pits and wider cable installation is small as works will be temporary, relatively localised and any changes to the in the intertidal zone seafloor morphology will naturally recover via sediment transport processes driven by wave and current action in shallow waters. There will, therefore, be no significant effects to intertidal or shallow subtidal ecology or morphology. As no significant effects are concluded, no further additional mitigation than currently outlined in **Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** is proposed. A meeting was held on MS Teams between National Grid and the National Trust to discuss **Application Document 9.13 (C) Pegwell Bay Construction Method Technical Note [REP4-229]** on 11/02/2026. The Applicant has provided a more detailed image of the intertidal exit pits including MHWS and MLWS in Appendix B. Additionally, a vertical cross section of the HDD profile at Pegwell Bay is also included within Appendix B. The exit pits during HDD construction are temporary excavations within the planned cofferdams to finalise the below ground termination of the ducts. They also include the installation of temporary protection, such as rock bags or concrete mattresses, to ensure the duct ends are secure while awaiting cable installation. The excavated material from the pits will be used to fill the pits on completion of these temporary works.	Under discussion

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			drilling fluid and the duct infill after the cables have been installed needs to be known in order to form an opinion about their environmental credentials in the circumstances of loss of the marine environment. Until the actual construction details and method statements for the cable installation and burial are defined it is difficult to form an opinion on potential environmental impact and appropriate mitigations in both the construction stages and the longer-term operational stage. We would concur with Natural England in the need for a HDD Management Plan, Intertidal Management Plan and Intertidal HRA to ensure that any potential issues arising during construction can be remedied without harm to the marine environment. A suggested solution the above would be for Trust to agree with the Applicant that the Trust will receive in a timely manner, the detailed designs, relevant material specifications and construction method statements and the Applicant to have regard to the Trust's comments.	For cable installation works, the duct ends will again be exposed by temporary excavations to enable cable installation. Upon completion of cable installation, permanent protection, such as rock bags, will be placed on the duct ends. The top of the protection will be a sufficient depth below seabed level to ensure it remains buried, and excavated material from the pits will again be re-used to fill the pits to natural seabed level. An indicative arrangement of the duct, protection, and cable at the HDD exit is shown in Appendix B. Following installation of the cable, the duct is expected to be filled with fresh water, and the duct ends sealed to prevent egress or ingress of external seawater or groundwater. With regards to drilling fluid specifications, the Applicant confirms that the draft Deemed Marine Licence currently states: "(1) *Unless otherwise agreed in writing by the MMO, all chemicals used in the construction of the authorised development must be selected from the List of Notified Chemicals approved for use by the offshore oil and gas industry under the Offshore Chemicals Regulations 2002 (as amended) as maintained by Cefas*". The Applicant confirms that the HDD contractor will produce a detailed, drilling fluid management plan to be approved by the MMO in consultation with relevant stakeholders including Natural England and the National Trust, that includes drilling fluid breakout mitigation measures, where HDD is proposed. This is currently secured within the Deemed Marine Licence **Application Document 9.92 (A) Outline Cable Specification and Installation Plan [REP4-090]**, and also within **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]** under **B59.** A Habitat Regulations Assessment (HRA) (**Application Document 6.6 (F) Habitats Regulations Assessment Report [REP4-057]**) has been completed and submitted for the whole project, including the intertidal designations at Pegwell Bay. A separate Intertidal HRA is therefore not required. The Applicant confirms that it has updated commitment **B59** within the Register of Environmental Actions and Commitments to include the provision for the National Trust to be consulted on the Landfall Method Statement prior to commencement of HDD activities (**Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]**). The Applicant also confirms that all activities at the Landfall are captured within **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** already submitted as part of the Application. A separate Intertidal Management Plan is therefore not required at	

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				this stage. An update to this document has been submitted at Deadline 4A alongside **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]** to ensure all marine commitments are captured and secured appropriately.	
		Additional mitigation	The National Trust continues to encourage the developer to consider additional mitigation to support the ongoing management and future conservation of Pegwell Bay and would welcome discussion on this topic with both the National Trust as landowner and the Kent Wildlife Trust as site manager.	This is noted by the Applicant. The Environmental Statement concluded no significant effects to intertidal or shallow subtidal ecology or morphology at Pegwell Bay. As no significant effects are concluded, no further additional mitigation than currently outlined in **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]** and **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** is currently proposed. The Applicant confirms that MPE08 outlined in **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234]** and **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** states that '*Further analysis will be undertaken to consider the potential for coastal erosion over the lifetime of the project in line with the final Offshore Construction and Environmental Management Plan. This information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the offshore burial cables is as reduced as far as practicable*'. It is in the Applicants interest to ensure that the cables at Pegwell Bay remain buried. Post installation survey and monitoring of the cables will be undertaken across the whole of the Offshore Scheme and is presented within **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** which is secured within the Deemed Marine Licence. A preliminary inspection, maintenance and repair (IMR) programme as the basis for preventative maintenance may comprise of the following: • Base-line as-built depth of lowering (DOL) survey (ideally a continuous survey after installation and protection completed). • Initial DOL monitoring survey 12 months after commissioning and handover to operations. • Regular monitoring surveys at 12-24 months duration to establish any areas where DOL hot spots may develop and where integrity of cable is critical (eg. Shipping channels, crossings) and inform the maintenance programme. Establish that the seabed	Under discussion

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				conditions and DOL have reverted to equilibrium and reduce the frequency of inspections. • Reduced interval surveys to ensure DOL is maintained (may be as much as 5-year interval). • Potential Digital Temperature and Acoustic Sensing (DTAS) HVDC cable monitoring via fibre optic cable with near real-time monitoring. As changes occur through time, these can be used as locators of potential seabed change resulting in heat changes, or areas where increase in vessel traffic through the lifetime of the asset may make the link more vulnerable to damage than was risked during the original design of the cable route (e.g. expansion in shipping channel network, or future crossing point for 3rd party asset). The DTAS HVDC cable monitoring would be carried out from the onshore converter stations, but the results would be used to inform the IMR programme each year, and the repair locations in the event of an outage or significant disruption to the transmission of power along the link. • Automatic Identification System (AIS) vessel monitoring to track any vessels stationery or acting suspiciously in the vicinity of the cable.	

4. Approvals

Signed	

On Behalf of	Consultee
Name	
Position	
Date	

Signed	

On Behalf of	National Grid
Name	
Position	
Date	

5. References

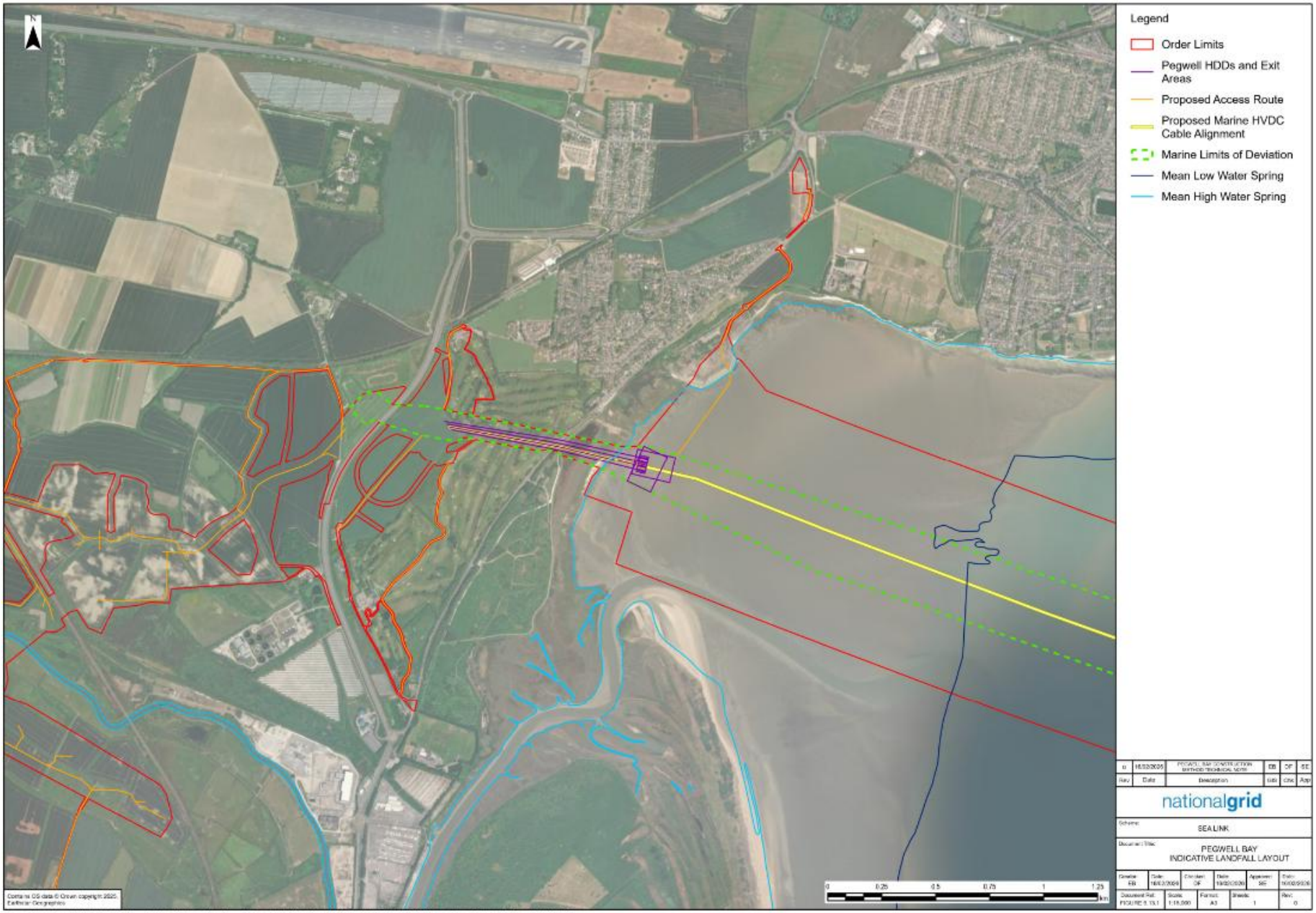
Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

Appendix A

Item Description	Securing Mechanism					
	Deemed Marine Licence				DCO Requirements	
	Direct DML Conditions	7.5.2 Offshore Construction Environmental Management Plan	9.92 Outline Cable Specification and Installation Plan	7.5.12 Invasive Non-Native Species Mitigation Plan / Biosecurity Plan	9.84 Register of Environmental Actions and Commitments	REAC ID Code
Trenchless landfall techniques to avoid the sensitive saltmarsh	x	x	x		x	B67, B69
Drilling Fluid Management Plan (Post Consent)		x	x		x	B59
Ecological Clerk of Works		x			x	GG04
Drilling fluid commitments and management	x	x	x		x	B59, LVS04, LVS05
Landfall Method Statement (Post Consent)		x			x	B59, B68
Invasive Non- Native Species Contamination				x	x	B66, B70, BE01, BE03, BE04
Pollution Prevention		x			x	B59, GM03, LVS04
Post- Installation monitoring for cable exposure		x	x		x	MP08

Application Document Number	Title	Link to Most Recent Submission
7.5.2	Outline Offshore Construction Environmental Management Plan	Deadline 4a Submission
7.5.3	Outline Onshore Construction Environmental Management Plan	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000795-7.5.3%20(B)%20Outline%20Onshore%20Construction%20Environmental%20Management%20Plan%20(Clean).pdf
7.5.7.2	Outline Landscape and Ecological Management Plan	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000916-7.5.7.2%20(B)%20Outline%20Landscape%20and%20Ecological%20Management%20Plan-%20Kent%20(clean).pdf
9.92	Outline Cable Specification and Installation Plan	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002484-9.92%20Outline%20Cable%20Specification%20and%20Installation%20Plan.pdf
7.5.12	Outline Invasive Non-Native Species Mitigation Plan	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-001255-7.5.12%20(B)%20Outline%20Offshore%20Invasive%20Non-Native%20Species%20Management%20Plan%20(Clean).pdf
7.7	Marine Biosecurity Plan	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002522-7.7%20(C)%20Marine%20Biosecurity%20Plan%20(Clean).pdf
7.8	Red Throated Diver Protocol	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000202-7.8%20Red%20Throated%20Diver%20Protocol.pdf
9.84	Register of Environmental Actions and Commitments	Deadline 4a Submission
6.6	Habitats Regulations Assessment Report	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002498-6.6%20(F)%20Habitats%20Regulations%20Assessment%20Report%20(Clean).pdf
9.73	Applicant's Responses to First Written Questions (Appendix I Indicative Vegetation Free Construction Traffic Route).	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002089-9.73.1%20Applicant's%20Responses%20to%20First%20Written%20Questions%20-%20Appendices.pdf
7.12.2	Design Principles	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000205-7.12.2%20Design%20Principles%20-%20Kent.pdf

Appendix B


N
Legend
Order Limits
Pegwell HDDs and Exit Areas
Proposed Access Route
Proposed Marine HVDC Cable Alignment
Marine Limits of Deviation
Mean Low Water Spring
Mean High Water Spring
Contains OS data © Crown copyright 2025. Earthstar Geographics
0
0.25
0.5
0.75
1
1.25
km
nationalgrid
SEALINK
PEGWELL BAY
INDICATIVE LANDFALL LAYOUT

NEMO borehole
100702-SD-004

Nemo Cable Route

NEMO sonic sampler SD-0141
NEMO CPT-0119

Chalk deeper than
-5.5m ODN

SANDWICH ROAD

Environmental Monitoring
Borehole/Landfill Site

Approximate alignment of former WWII fuel pipeline

MHWS

MHWS

edge of salt marsh vegetation

65.39

40.00

64.87

105.00

145.00

115.00

HDD EXIT

30.00

5.00

20.24

20.24

20.24

Indicative Option of Coffer Dams to cover single HDD exits. Indicated size for construction by sheet piling (vibropiles)

A'

Indicative 120m x 80m working area around HDD exits

PLAN VIEW

HDD EXIT
AT 0.20m ODN, 2.42m above LAT

A'

Coffer Dam
length
30.00m

CLAY SILT SAND, with Bullhead Beds
GRAVEL at base (THANET SAND FMN)

SHALLOW LAGOON

SALTMARSH

NEMO borehole
100702-SD-004
Elevation assumed

Soft CLAY & loose SAND with occ. shell fragments (ALLUVIUM)

Structureless CHALK of chalk GRAVEL and COBBLE NEWHAVEN CHALK FORMATION(?) (Grade Dc)

Very weak to weak medium to high density CHALK NEWHAVEN CHALK FORMATION
(Grade B3, locally B2-A3 at depth)

Weak high density CHALK with medium to widely spaced flint bands
SEAFORD CHALK FORMATION (Grade A2-A3)

18.04

15.41

Rock Bag Protection

Duct

Cable

CLAY SILT SAND, with Bullhead Beds
GRAVEL at base (THANET SAND FMN)

NEMO sonic sampler SD-0141

NEMO CPT-0119

Soft CLAY & loose SAND with occ. shell fragments (ALLUVIUM)

Assumed Structureless CHALK (Grade Dc)

Assumed very weak to weak, medium to high density CHALK (potentially Grade B3)

Assumed weak high density CHALK with medium to widely spaced flint bands
SEAFORD CHALK FORMATION (Grade A2-A3)

0.00
-10.00
-20.00
-30.00
-40.00
-50.00

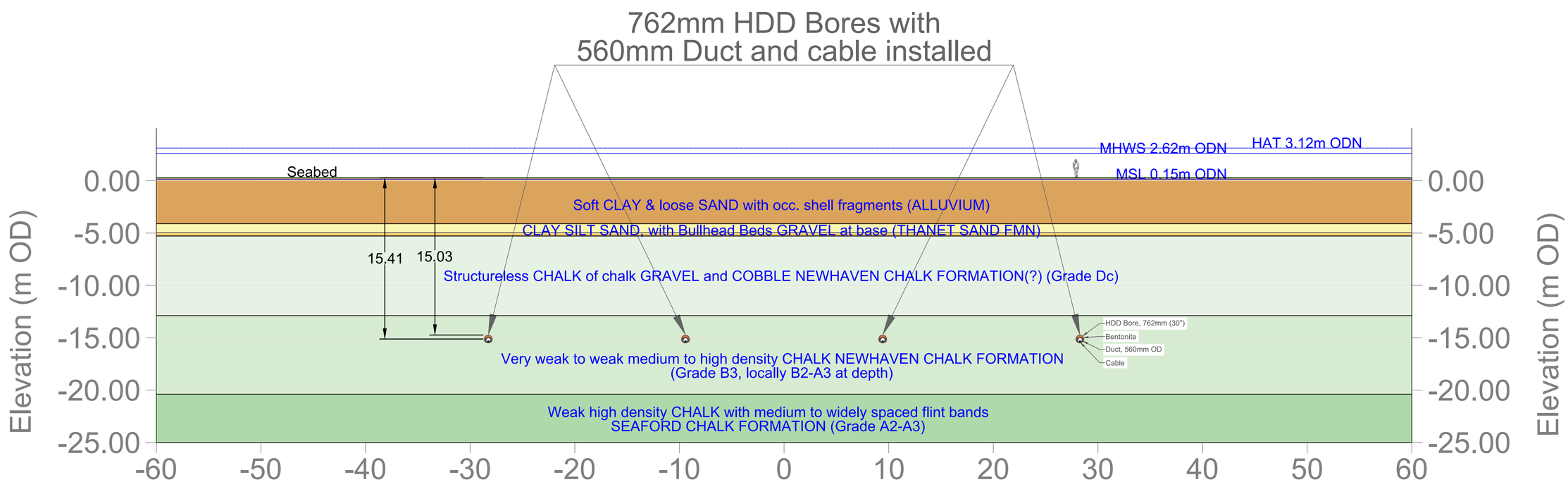
Elevation (m OD Newlyn)

550 575 600 625 650 675 700 725 750 775 800 825 850 875 900 925 950 975 1000 1025 1050 1075

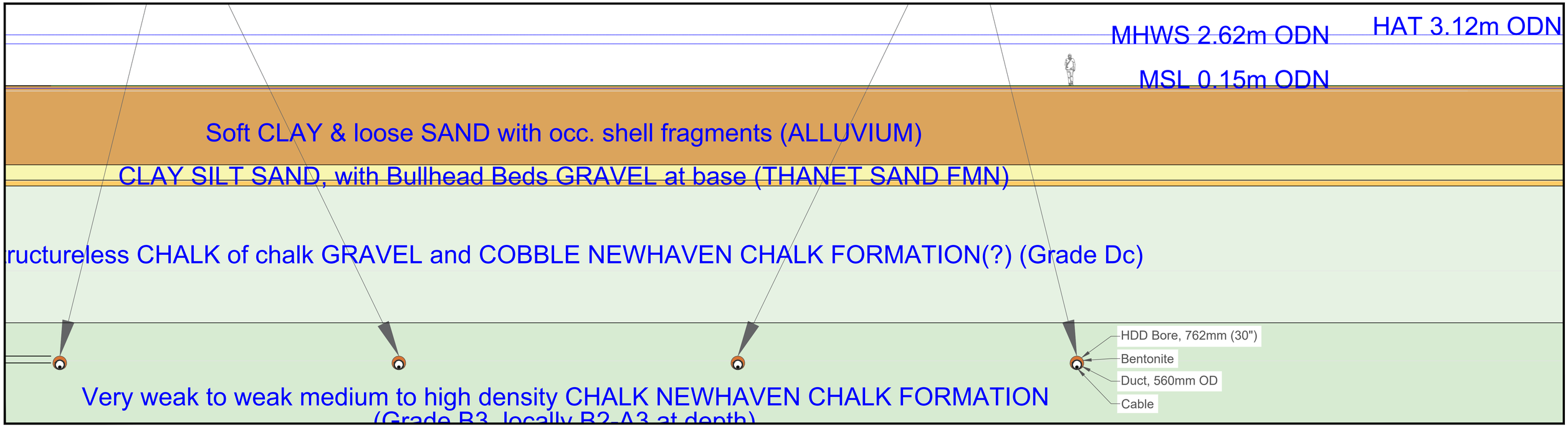
CHAINAGE FROM ENTRY (m)

SECTION VIEW

TRANSVERSE SECTION AT 805m, THE EASTERN EDGE OF THE SALTMARSH, SHOWING HDD'S AT TRUE SCALE



TRANSVERSE VIEW AT SALTMARSH



TRANSVERSE VIEW AT SALTMARSH - DETAIL

National Grid plc

National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com