

**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

**Document 9.66: Draft Statement of Common Ground Between National Grid Electricity Transmission and East of England Ambulance Services NHS Trust**

**Planning Inspectorate Reference: EN020026**

**Version: A  
March 2026**

**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”) 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 East of England Ambulance Service NHS Trust (EEAST). 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 Examination period to reach a final position between the Applicant and EEAST 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 EEAST will jointly be referred to as the “Parties”. When referencing EEAST alone, they will be referred to as “the Consultee”.

## 1.3 Role of EEAST in the DCO process

- 1.3.1 EEAST provides accident and emergency services for people in need of urgent medical treatment and transport in Bedfordshire, Hertfordshire, Essex, Norfolk, Suffolk and Cambridgeshire. The EEAST is recognised as an interested party in this planning process, operating in close association with blue light partner organisations, namely Suffolk Constabulary and Suffolk Fire & Rescue Services.
- 1.3.2 The Applicant has consulted with the Consultee for the purposes of the Proposed Project. The consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between EEAST and the Applicant.

- 1.3.3 EEAST has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for 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.

- 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**

<b>Abbreviation/Term</b>	<b>Definition</b>
AIL	Abnormal Indivisible Loads
CEMP	Construction Environmental Management Plan
CoCP	Code of Construction Practice
DCO	Development Consent Order
EAP	Emergency Action Plan
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SPR	Scottish Power Renewables
TJB	Transition Joint Bay

## 2. Record of Engagement

### 2.1 Summary of discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties.

**Table 2.1 Record of meetings and correspondence**

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
<i>Oct – Dec 2022</i>	<i>Non-statutory Consultation</i>	<i>A period of non-statutory consultation was held for between, the 24 October 2022 to 18 December 2022. The consultation introduced the Proposed Project and its background through documentation including a corridor and preliminary routing and siting study.</i>
<i>Oct – Dec 2023</i>	<i>Statutory Consultation</i>	<i>Statutory public consultation occurred from 24 October to Monday 18 December 2023. The statutory public consultation provided details of the Proposed Project, along with supporting environmental information, and an update on how the proposals have developed since the last consultation in 2022.</i>
<i>July 2024</i>	<i>Targeted Consultation</i>	<i>Proposed Project update since the close of statutory consultation in December 2023, and further technical and environmental assessments. As a result of this work, changes to the plans were shared.</i>
<i>14 April 2025</i>	<i>Meeting between NGET and EEAST</i>	<p><i>Meeting between Sea Link Consents Team and EEAST, to provide an update on the project and looking forward to next steps.</i></p> <p><i>EEAST summarised the issues raised in previous consultation responses.</i></p> <p><i>It was noted in the meeting that coordinating with other emergency and blue light services could be useful in regards to resolving concerns raised.</i></p>
<i>06 June 2025</i>	<i>Relevant Representation</i>	<i>The EEAST provided a relevant representation noting that they believe the Proposed Project is likely to have a significant impact on its emergency ambulance operations, service capacity and resources (staff, vehicle fleet and estate assets) requiring appropriate mitigation and management measures to be identified and secured through either a planning obligation or Deed of Covenant. Additionally, within their representation, they provided measures that they would</i>

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Date	Topic	Discussion points
		<i>like incorporated. These are discussed in Section 3 below.</i>

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## 3. Areas of Discussion Between the Parties

### 3.1 EEAST resource

Table 3.1 Traffic and resource

Ref	Relevant Application Document	Summary of Description of Matter	EEAST Current Position	The Applicant Current Position	Status
3.1.1	<b>Application Document Outline Construction Traffic Management and Travel Plan – Suffolk [REP4-061]</b>	EEAST resource capability	<ul style="list-style-type: none"> <li>• Assessment of increase in emergency ambulance activity (calls and attendance) as a result of this project to ensure EEAST’s is provided with sufficient resources to meet this additional capacity.</li> <li>• EEAST to have the capability to manage the additional incidents where emergency ambulance services may be required: EEAST’s staff, vehicle fleet &amp; estate assets can prepare through all stages of the project, namely pre-construction, during and post construction and agree mitigation measures.</li> </ul>	The Outline Construction Traffic and Management and Travel Plan sets out proposals for the management of construction-related traffic along the local highway network within the vicinity of the Suffolk Onshore Scheme during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. This document also includes the expected construction programme, where the resources and timescales can be seen. The Proposed Project will take every reasonable precaution to ensure a safe working environment, and it supports the perspective on ways to improve safety within	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	EEAST Current Position	The Applicant Current Position	Status
				<p>the project and the wider community.</p> <p>The Proposed Project invites the EEAST to review <b>Application Document Outline Construction Traffic Management and Travel Plan – Suffolk [REP4-061]</b> in the context of EEAST’s statutory duties &amp; the National Quality Requirements (NQR) for ambulance response &amp; handover times and in the context of NQR Category 1 ‘life threatening’ calls.</p> <p>Any feedback can be incorporated into the subsequent revision if applicable.</p>	

## 3.2 Documentation

**Table 3.2 Documentation**

Ref	Relevant Application Document	Summary of Description of Matter	EEAST Current Position	The Applicant Current Position	Status
3.2.1	N/A	Terms of Reference, Membership & Communications Strategy for Transport, Community Safety, Health & Wellbeing Working Group	Establish appropriate Terms of Reference, Membership & Communications Strategy for Transport, Community Safety, Health & Wellbeing Working Group – to include EEAST as an emergency service provider, along with its health and blue light partners such as the local Suffolk & North East Essex Integrated Care System, Suffolk Constabulary and Suffolk Fire and Rescue.	<p>The Proposed Project will look to achieve the following</p> <ul style="list-style-type: none"> <li>• Advanced notification of road closures &amp; diversions;</li> <li>• Advanced notification of Abnormal Indivisible Loads (AIL) routeing, movements &amp; timing;</li> <li>• Consultation on the draft Construction Environmental Management Plan (CEMP), Code of Construction Practice (CoCP), and Emergency</li> </ul>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	EEAST Current Position	The Applicant Current Position	Status
				<p>Action Plan (EAP) – This will be produced by the contractor in subsequent design stages.</p> <ul style="list-style-type: none"> <li>Establishment and inclusion of EEAST and its health and blue light partners within a Transport, Community Safety, Health &amp; Wellbeing Working Group.</li> </ul>	

# 4. Approvals

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**Signed**

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**On Behalf of**

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**Name**

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**Position**

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**Date**

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**Signed**

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**On Behalf of**

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**Name**

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**Position**

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**Date**

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## 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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