

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

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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 Southern Gas Networks PLC (‘SGN’). 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 SGN 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, National Grid and the SGN will jointly be referred to as the “Parties”. When referencing the SGN alone, they will be referred to as “the Consultee”.

1.3 Role of SGN in the DCO process

- 1.3.1 SGN manages natural and green gas distribution networks in Scotland, south of England, and the west of Northern Ireland. SGN are regulated by Office of Gas and Electricity Markets (Ofgem) and are owners of a Gas Transporter license.
- 1.3.2 The consultee should provide guidance and comments on the Sea Link proposal and co-own the SoCG between SGN and National Grid.
- 1.3.3 SGN has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the Proposed Project and SGN has existing assets within the Proposed Project’s Order Limits.

1.4 Description of the Proposed Project

- 1.4.1 The Proposed Project is a proposal by National Grid to reinforce the transmission network in the Southeast and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.4.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.
- 1.4.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.
- 1.4.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:
- 1.4.5 Schedule 9(1)(a) '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;*' and
- 1.4.6 Schedule 9(1)(b) '*...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'.
- 1.4.7 The Proposed Project would comprise the following elements:

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.

- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

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’, ‘not agreed but not material’, or are ‘under discussion’. ‘Not agreed’ indicates a final position where the Parties have agreed to disagree, whilst ‘Agreed’ indicates where the issue has been resolved. ‘Not agreed but not material’ indicates that although the parties have not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed.

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

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
RAMS	Risk Assessment Method Statement
SGN	Southern Gas Network
SoCG	Statement of Common Ground
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 Engagement with SGN

Date	Topic	Discussion points
03/08/2022	<i>Initial consultation email</i>	<i>Initial consultation email sent to SGN. The email included a summary document which comprised indicative scheme drawings, to help provide some context for the scheme, details of the proposal, and impact on SGN's assets.</i>
Oct – Dec 2022	<i>Non-statutory Consultation</i>	<i>A period of non-statutory consultation was held for between, the 24 of October 2022 to 18 December 2022. The consultation introduced the Proposed Project and its background through documentation including a corridor and preliminary routing and siting study.</i>
17/05/2023	<i>Proposal update email</i>	<i>Updated consultation document (SEAL-MMD-SEAL-ENG-TCN-0136 P02) including outline of Proposed Project, interfaces with SGN and outline drawings of the Proposed Project.</i>
17/10/2023	<i>Follow up email</i>	<i>Updated consultation Document (SEAL-MMD-SEAL-ENG-TCN-0136 P02) re issued to SGN.</i>
Oct – Dec 2023	<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>
July 2024	<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 where shared.</i>
02/10/2024	<i>Update Meeting</i>	<i>Meeting between engineering and consenting teams with SGN. The design progress overview was shared, and discussion was had around Sea Link interface with SGN.</i>
04/10/2024	<i>Actions from meeting on 02/10/2024</i>	<i>Sea Link General Arrangement Plans (Targeted Consultation) and GIS layers sent to SGN as part of an action from 02/10/2024 meeting.</i>
22/11/2024	<i>Actions from meeting on 02/10/2024</i>	<i>Response received from SGN, following the 02/10/2024 meeting confirming, an Asset Protection Agreement will be required.</i>
09/01/2025	<i>Design update issue</i>	<i>Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0738 P01) and design interface document (SEAL-MMD-SEAL-ENG-TCN-0756) issued to SGN for their review</i>

Date	Topic	Discussion points
10/01/2025	<i>Proposed Project Update meeting</i>	<i>MS teams meeting with consenting and engineering teams with SGN. Proposed Project updated discussed and status of timeline for DCO submission shared - discussion around protective provisions.</i>
25/02/2025	<i>Missing gas interface and protective provisions</i>	<i>Email from SGN highlighting that an additional area added to the Proposed Project for a construction compound north of Sandwich Road that interact with a medium pressure main. The same email also highlighted that SGN would outsource the review and acquisition of Protective Provisions to an external panel firm.</i>
28/02/2025	<i>Re-issue of Design interface document</i>	<i>The Proposed Project's engineering team re-issued an updated Design Interface Document (SEAL-MMD-SEAL-ENG-TCN-0756) to capture the details of the medium pressure main previously raised by SGN. SGN asked to contact the Proposed Project's engineering team if they have any questions or items, they would like to discuss that this stage.</i>
20/02/2026	<i>Comment on Design interface document</i>	<i>After a follow-up from the Applicant, SGN provided comments to the principles set out in the Design Interface Document (SEAL-MMD-SEAL-ENG-TCN-0756). These have been incorporated into the position within the SoCG.</i>

3. Areas of Discussion Between the Parties

3.1 Actions prior to construction

Table 3.1 Actions prior to construction

Ref	Relevant Application Document	Summary of Description of Matter	SGN Current Position	The Applicant Current Position	Status
3.1.1	N/A	RAMS documentation	RAMS documents, drilling plan for trenchless crossings, contingency arrangement plan to be confirmed prior to being on site.	Agree with SGN position.	Agreed
3.1.2	N/A	Trial pits	Trial pits required to identify depth of asset prior to works on site.	Agree with SGN position.	Agreed

3.2 The Proposed Project and SGN assets

Table 3.2 The Proposed Project and SGN assets

Ref	Relevant Application Document	Summary of Description of Matter	SGN Current Position	The Applicant Current Position	Status
3.2.1	N/A	Medium Pressure Main that feeds between Sandwich Road and Biomethane plant at Ebbsfleet Roundabout.	The trenchless methodology is acceptable in principle. Clearance to SGN apparatus will need to be confirmed following review of the final drill profile and agreed prior to works commencing. Asset depths currently appear to be based on C2 data and assumed NJUG depths; therefore, pre-construction verification will be required to confirm actual depth and alignment. A detailed HDD method statement, including frac-out mitigation and monitoring arrangements, should be submitted for review.	Agree with SGN position. Positive identification of SGN's assets should be undertaken. Detailed design of the HDD, mitigations and frac-out assessments will be undertaken in subsequent design stages.	Agreed
3.2.2	N/A	Interface along Sandwich Road	Protective track matting and/or suitable load distribution measures are acceptable in principle. However, loading assessments should demonstrate that construction	Agree with SGN's position.	Agreed

			<p>traffic and plant do not impose excessive loading on the main. Statutory minimum cover must be maintained unless otherwise agreed.</p>		
3.2.3	N/A	Medium pressure main under construction compound	<p>Where the compound footprint overlies or is adjacent to the MP main, confirmation of depth and alignment will be required prior to construction. Imposed loads from plant, storage, or hardstanding must be assessed to ensure pipeline integrity is not compromised. Appropriate controls should be implemented to manage settlement risk and maintain future access to the asset.</p> <p>All works in proximity to SGN apparatus must comply with current SGN Plant Protection requirements and safe digging practices. Final drawings, method statements and any relevant loading calculations should be submitted for review prior to commencement.</p>	<p>Agree with SGN position. Positive identification of SGN's assets should be undertaken. Control measures to be applied, such as setting exclusion zones over the asset; this is to be confirmed at detailed design.</p> <p>Engagement to continue throughout the detailed design process.</p> <p>Works to apply principles set out in SGN's Dig Safely, measures to avoid injury and damage to gas pipes (SGN064N (03/17)).</p>	Agreed

3.3 Protective provisions

Table 3.3 Protective Provisions

Ref	Relevant Application Document	Summary of Description of Matter	SGN Current Position	The Applicant Current Position	Status
3.3.1	N/A	Asset protection agreement	Based on the information provided to date, an Asset Protection Agreement will be required. This will be outsourced to one of SGN's external panel solicitors with the costs met by the Sea Link scheme.	To be developed with the Applicant and BCLP.	Under Discussion

4. Approvals

Signed

On Behalf of Southern Gas Networks PLC

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>

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