

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.59: Draft Statement of Common Ground Between National Grid Electricity Transmission and Scottish Power Renewables (SPR).

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nationalgrid

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1. Introduction

1.1 Overview

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application process for a Development Consent Order (DCO) and is prepared jointly between the applicant and another party. It 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.
- 1.1.2 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.
- 1.1.3 This SoCG is between National Grid Electricity Transmission Ltd (National Grid), ScottishPower Renewables (UK) Limited (SPRUKL), East Anglia ONE North Limited (EA1NL) and East Anglia TWO Limited (EA2L) (hereafter collectively referred to as “SPR”) relating to the DCO application for the Sea Link Project (hereafter referred to as the “Proposed Project”).

1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and SPR. It is based on the draft DCO and plans submitted to and published by the Examining Authority as of 4 March 2026. The SoCG will evolve as the DCO application progresses to submission and through examination.
- 1.2.2 For the purpose of this SoCG, National Grid and SPR will jointly be referred to as the “Parties”. When referencing SPR alone, they will be referred to as “the Consultee”.

1.3 Description of the Proposed Project

- 1.3.1 The Sea Link Project (hereafter referred to as the ‘Proposed Project’) is a proposal by National Grid to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as an addition to new interconnection with mainland Europe.
- 1.3.2 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.
- 1.3.3 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.

- 1.3.4 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:
- 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’.

1.3.5 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 the East Anglia TWO Offshore Windfarm (“EA2”) and East Anglia ONE North Offshore Windfarm (“EA1N”). 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.

1.3.6 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to the EA2 and EA1N DCOs) 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.

1.4 Format of Document and Terminology.

1.4.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.

1.4.2 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.

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

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
EA1N	East Anglia ONE North Offshore Windfarm
EA2	East Anglia TWO Offshore Windfarm
Friston Substation	National Grid substation at Friston, also known as Kiln Lane Substation (Renamed)
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
NGV	National Grid Ventures
SPR	ScottishPower Renewables (UK) Limited

Abbreviation/Term	Definition
TJB	Transition Joint Bay

2. Record of Engagement

2.1 Role of SPR in the DCO process

- 2.1.1 SPRUKL is part of the ScottishPower group of companies operating in the UK under the Iberdrola Group, one of the world's largest integrated utility companies and a leader in wind energy. EA2L and EA1NL, both wholly owned subsidiaries of SPRUKL, have received development consent for EA2 and EA1N respectively. To accommodate the electricity produced by EA2 and EA1N a Gas Insulated Switchgear (GIS) onshore substation is required along with the associated cable routing (Friston substation). Friston substation is also referred to as Kiln Lane substation.
- 2.1.2 SPR have the benefit of a number of Option agreements within the Proposed Project's Order Limits and as such is named as an Affected Person in the Project's Book of Reference (document 4.3). As explained in SPR's Relevant Representation, SPRUKL will assign the benefit of the SPRUKL option agreements to EA1NL and EA2L and anticipate that the majority of the Option notices will be served before the close of the Examination. A number of Option agreements have been assigned to EA1NL and EA2L, and a number of Option notices have been served.
- 2.1.3 National Grid will construct, own and maintain Friston substation. The power to construct the Friston substation is contained within EA1N and EA2's consents, as well as the Sea Link application. It is anticipated that National Grid will construct Friston substation under the SPR consents and connect into this for Sea Link. This means that there is an overlap in the Order limits for the three projects in the area north of the village of Friston; an area that will include three substations; for EA1N, EA2 and National Grid (Friston substation), as well as landscape mitigation, drainage diversions and mitigation, public rights of way diversions and access. National Grid has been progressing the design for Friston substation and providing information to SPR to enable the discharge of requirements on the SPR DCOs related to Friston substation. National Grid has also been reviewing draft documents intended for discharge of SPR's requirements at the wider site. Outside Friston substation itself, the cables for the Sea Link project will pass through the Order limits for the SPR projects and the Parties have been discussing how to manage this interaction, relating predominantly to the installation of underground cables.
- 2.1.4 SPR submitted a Relevant Representation dated 23 June 2025 to the Planning Inspectorate in relation to the Proposed Project in which it set out most of the interactions between the Proposed Project and EA1N and EA2.

2.2 Summary of discussions

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

Table 2.1 Record of meetings and correspondence with the SPR

Date	Topic	Discussion points
30 September 2022	Initial consultation email	Initial consultation email sent to SPR. 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 SPR's assets.
October – December 2022	Non-statutory Consultation	A period of non-statutory consultation was held 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.
October – December 2023	Statutory Consultation	Statutory public consultation occurred from the 24 of 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.
14 November 2023	Sea Link Briefing	Meeting requested by the SPR EA1N and EA2 Project teams to provide a briefing on the National Grid Sea Link Project.
22 November 2023	National Grid/SPR Designer Discussion	Meeting between SPR's Architects OPEN (SLR) and National Grid Sea Links Landscape and Visual Team and Architects C & W to discuss design principles in the area and the approach to these.
January – March 2024	Drainage e-mail chain	Request for updated drainage information at the Friston Substation site by the project engineering team. Updated drainage information was passed on from SPR designer and design coordination agreed between SPR and National Grid regarding drainage.
July 2024	Targeted Consultation	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.
October 2021 – To Date	Monthly Updates	As part of monthly SPR/National Grid meetings regarding delivery of the Kiln Lane Substation updates were provided regularly, but not always, on the application for the Proposed Project.
February 2023 – To Date	Sharing Of GIS Files	Design freeze 2, 3 and 4 and the DCO Shape files have been shared by National Grid to SPR. SPR's DCO Shape File, Works plans Shapefile and Archaeological Shapefiles have been shared with National Grid.
22 February 2024	National Grid/SPR/Open (SLR) Meeting	National Grid and SPR had a meeting with the SPR Architects OPEN (now SLR) to discuss landscaping for the Kiln Lane Substation. The Sea Link project was discussed as an interaction with the substation at Friston and the Landscaping at this meeting
23 April 2024	National Grid /SPR Lands workshop	Lands workshop at SPR offices London to discuss the Friston Substation land requirements. Sea Link land interactions were discussed at this meeting. Discussion was around how SPR would let land they had under option be accessed by National Grid for the purpose of Sea Link
24 April 2024	SPR /National Grid /NGV – Friston Screening / Cable Route Discussion	A meeting to discuss the cable route into Friston substation and the effect of the cable routes on the SPR Screening.
21 May 2024	National Grid/NGV/SPR Workshop	Meeting at the Clermont Hotel in London facilitated by the National Grid team to discuss Friston substation and the interaction of the National Grid Sea Link and NGV projects. Item 3 on the agenda was Sea Link

Date	Topic	Discussion points
		<i>specific item to discuss the cable routes and how this would interact with the landscaping and mitigation at Friston.</i>
11 July 2024	<i>NGV /SPR /National Grid Call Before LPA Call</i>	<i>Call to have an internal chat before the Local Planning Authority call with regards to landscaping. Covering the interaction of the Sea Link and Lionlink Projects with the SPR mitigation and landscaping.</i>
22 July 2024	<i>EA2/EA1N SPR National Grid Environmental Interface Meeting</i>	<i>Discussion of the environmental interface at Friston substation and with the Sea Link team, specific discussion on a potential veteran tree on the access road.</i>
23 July 2024	<i>National Grid/SPR Landscape Meeting</i>	<i>Meeting between National Grid and SPR landscape teams to discuss landscape proposals at Friston under the EA1N/EA2 DCOs, specifically the SPR detailed landscape design for the Friston and refinements from the consented outline landscape design for EA2/EA1N..</i>
25 July 2024	<i>National Grid /SPR Sea Link Archaeological Works Interface</i>	<i>Discussion on Sea Link Trial Trenching for its cable route with SPR's team and any overlap with work previously done and any lessons learnt by SPR while carrying out their trail trenching.</i>
30 September 2024	<i>National Grid/NGV/SPR Landscape Masterplan Discussion & Mitigation</i>	<i>SPR hosted a virtual meeting with representatives from National Grid Sea Link and NGV Lionlink to discuss Landscape Masterplan design and how this will be impacted by the future projects.</i>
September 2024 – to Date	<i>Monthly Project Director / Senior Manager Meetings</i>	<i>Meeting between the SPR and National Grid Senior managers to discuss delivery of the Friston Substation. The Sea Link project was occasionally discussed as relevant, but was not the primary purpose of the meetings.</i>
8 October 2024	<i>Landscape meeting</i>	<i>Meeting between National Grid, SPR, National Grid Ventures and East Suffolk Council discussing landscaping at Friston substation.</i>
22 January 2025	<i>SPR/National Grid Meeting</i>	<i>Meeting between National Grid and SPR at the Sea Link project office to discuss Friston substation and Sea Link. Agenda Item on the Program – specific discussion around Sea Link</i>
12 February 2025	<i>SPR/National Grid/NGV Community Engagement Run Through</i>	<i>SPR are carrying out Stage 1 community engagement at the substation, with the focus on landscaping. The date is 24 February. Whilst National Grid and NGV attendance is not required, we need to provide you a run through and get feedback on what we can and can't say about your projects. The community will ask us a lot of questions about Sea Link and Lionlink. Our graphics that we use for engagement will show National Grid and NGV projects.</i>
26 March 2025	<i>SPR/National Grid</i>	<i>Meeting between National Grid and SPR hosted by SPR at the Novotel Blackfriars to discuss Friston substation. Sea Link program item on the agenda.</i>
16 July 2025	<i>National Grid/SPR Landscape Meeting</i>	<i>Meeting between National Grid and SPR to discuss the status of the SPR detailed landscape design and Sea Link interaction. Discussions around differences between Sea Link Scenario 2 landscape plans and evolving SPR detailed landscape design.</i>
23 July 2025	<i>SPR/National Grid</i>	<i>Meeting between National Grid and SPR hosted by National Grid at the Novotel Blackfriars to discuss Friston substation. Sea Link program item on the agenda. Limited attendance from National Grid and some areas</i>

Date	Topic	Discussion points
		<i>of SPR due to Sea Link DCO Training and SPR Public consultation on the 24 July 2025 in Suffolk</i>
24 July 2025	<i>SPR Public Consultation Snape Malting</i>	<i>At the request of SPR, National Grid attended the Stage 2 consultation of their landscape, drainage and Architectural design event at Snape Maltings to discuss the National Grid Friston Substation and the Sea Link interaction with the SPR Landscaping. National Grid and NGV had provided a drawing which was shown to the public showing what the possible future of Friston would look like.</i>
7 August 2025	<i>National Grid/SPR Landscape Meeting</i>	<i>Meeting between National Grid Landscape and SPR Landscape teams to discuss the updated SPR landscape design at Friston substation and interaction with Sea Link with a specific focus on Sea Link and Lionlink cables.</i>
22 October 2025	<i>National Grid /NGV /SPR Architectural and Landscape Meeting</i>	<i>Meeting Hosted by National Grid in Edinburgh to discuss the ongoing design of the SPR Landscape and Architectural treatment of the Friston Substation and the interaction of the Sea Link and Lionlink cables into the Friston Substation</i>
23 October 2025	<i>National Grid / SPR Lands Meeting</i>	<i>Meeting hosted by National Grid in Edinburgh to discuss the Friston substation Land requirements and the Sea Link land requirements in land owned or under option to SPR.</i>
28 October 2025	<i>SPR Public Consultation Snape Malting</i>	<i>At the request of SPR, National Grid attended the Stage 3 consultation of their landscape, drainage and Architectural design event at Snape Maltings to discuss the National Grid Friston Substation and the Sea Link interaction with the SPR Landscaping.</i>
31 October 2025	<i>SPR / National Grid Cable Crossing Meeting</i>	<i>Meeting to discuss the crossing of the SPR cables with the National Grid HVDC Cables and how this can be achieved. Further information is needed by both parties, requests will be made for this information and a further meeting set up to finalise the detail.</i>
3 December 2025	<i>SPR/NGET Landscape Masterplan</i>	<i>Meeting between National Grid and SPR including landscape teams to discuss the SPR Substations Landscape Masterplan at Friston and interface with Sea Link cable crossings.</i>
18 December 2025	<i>SPR / NGET land rights</i>	<i>Meeting to work through various land agreements required. Plans and draft documents to follow.</i>
13 January 2026	<i>SPR/NGET Coordinated Landscape Masterplan</i>	<i>Meeting between National Grid and SPR including landscape teams to discuss a coordinated landscape masterplan which reflected the Sea Link and LionLink cable interfaces including crossing areas of scrub planting, maintaining the desired mitigation functions of the landscape masterplan and agreement on the delivery of a coordinate masterplan.</i>

3. Areas of Discussion Between the Parties

3.1 Topic 1

Table 3.1 Topic 1 Principle of including Friston Substation in the Sea Link Application

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.1.1	N/A	Inclusion of Friston Substation in the Sea Link application	SPR understand the need to include Friston substation in the Sea Link application but note their concerns regarding the exercise of the compulsory acquisition powers National Grid would be granted as a result of this (see Ref 3.4.3).	National Grid is progressing the design of Friston substation and is working closely with SPR on the discharge of requirements to enable construction to start in earnest. The Parties are also working closely together on a transfer of benefit agreement that will provide National Grid with the powers to construct under the SPR consent; it remains the intention of the Parties to construct the substation under the EA2 consent. However, until agreements are finalised National Grid do not have the consents and land rights to deliver the substation and it is therefore necessary for the Sea Link application to include Friston substation.	Under Discussion

3.2 Topic 2

Table 3.2 Topic 2 – Routing of National Grid HVDC Cables

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.2.1	N/A	Interaction between the HVDC Cables for the Proposed Project and the SPR onshore cables – one crossing of both EA2 and EA1N Cables is required	<p>A high-level picture of the crossing has been provided by National Grid, identifying the cable interface. SPR has drafted bespoke Protective Provisions and provided these to National Grid. Under the proposed Protective Provisions, National Grid is to provide a cable crossing design plan for review and approval. A crossing agreement will also be required.</p> <p>Further engagement will be required, including National Grid’s cable contractor, to co-ordinate the planning and implementation of cable works.</p>	<p>This crossing of the HVDC cables will be designed to suit both National Grid and SPR Cables. This will be part of a crossing agreement between the parties that is currently being progressed.</p> <p>National Grid is awaiting further information about the design of the SPR cables to enable the full design plan to be finalised.</p> <p>SPR have submitted a draft of Protective Provisions to National Grid. National Grid is reviewing these with a view to including Protective Provisions into the draft DCO at Deadline 5 insofar as they can be agreed.</p>	Under Discussion
3.2.2	N/A	The routeing of the HVDC cables past the Friston Substation and	An EA1N/EA2 landscape masterplan has been prepared on the basis of the Outline Landscape and	National Grid agrees that a landscape masterplan can be developed for the EA1N/EA2 projects with the Sea Link cables	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
		potential interactions with landscaping	<p>Ecological Management Strategy (OLEMS) submitted and certified as part of the examination process for the EA1N and EA2 DCOs. The masterplan has been refined as part of detailed design in key areas, site visits post consent, further modelling of views, and landowner engagement.</p> <p>The landscaping masterplan was discharged, under Requirements 14 and 15 of the EA1N/EA2 DCOs, in late February 2026. It is anticipated that the landscape masterplan will be amended (under EA2/EA1N requirement 40) where the Sea Link or Lionlink cables come through.</p> <p>SPR’s engagement with NGET and NGV to date indicates that the cables for Sea Link and Lionlink could affect limited sections of trees to the north east and north west. Based on our knowledge, and engagement</p>	<p>in situ that does not harm the framework of the landscape masterplan discharged by SPR in February 2026.</p> <p>National Grid, SPR and NGV have been working together on a coordinated masterplan, with the latest version of this masterplan submitted into the Sea Link Examination in Figure 5 Friston Substation Outline Landscape Masterplan provided in the Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065].</p> <p>SPR and National Grid are working together to agree the process for submitting the final coordinated masterplan for discharge under EA2/EA1N requirement 40, as directed by ESC.</p>	

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			<p>with NGET and NGV, it is considered that the functionality of the landscape framework can be maintained in the circumstances above.</p> <p>SPR will continue to work closely with both Sea Link and Lionlink on revised mitigation plans that address the effects of these cables on the discharged landscape masterplan.</p>		

3.3 Topic 3

Table 3.3 Topic 3 - Routing of the HVAC Cables

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.3.1	N/A	The routing of the HVAC cables into the Friston Substation and landscaping proposed by SPR.	<p>An EA1N/EA2 landscape masterplan has been prepared on the basis of the Outline Landscape and Ecological Management Strategy (OLEMS) submitted and certified as part of the examination process for the EA1N and EA2 DCOs. The masterplan has been refined as part of detailed design in key areas, site visits post consent, further modelling of views, and landowner engagement.</p> <p>The landscaping masterplan was discharged, under Requirements 14 and 15 of the EA1N/EA2 DCOs, in late February 2026. It is anticipated that the landscape masterplan will be amended (under EA2/EA1N requirement 40) where the Sea Link or Lionlink cables come through.</p>	<p>National Grid agrees that a landscape masterplan can be developed for the EA1N/EA2 projects with the Sea Link cables in situ that does not harm the framework of the landscape masterplan discharged by SPR in February 2026.</p> <p>National Grid, SPR and NGV have been working together on a coordinated masterplan, with the latest version of this masterplan submitted into the Sea Link Examination in Figure 5 Friston Substation Outline Landscape Masterplan provided in the Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk, submitted at D4 [REP4-065].</p>	Under Discussion

SPR's engagement with NGET and NGV to date indicates that the cables for Sea Link and Lionlink could affect limited sections of trees to the north east and north west. Based on our knowledge, and engagement with NGET and NGV, it is considered that the functionality of the landscape framework can be maintained in the circumstances above.

SPR will continue to work closely with both Sea Link and Lionlink on revised mitigation plans that address the effects of these cables on the discharged landscape masterplan.

SPR and NGET are working together to agree the process for submitting the final coordinated masterplan for discharge under EA2/EA1N requirement 40, as directed by ESC.



3.4 Topic 4

Table 3.4 Topic 4- Compulsory Acquisition

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.4.1	N/A	Compulsory acquisition powers being sought for areas that SPR has acquired or is in the process of acquiring.	<p>EA1N/EA2 have concerns regarding how compulsory acquisition powers will interact with EA1N's/EA2's construction works and operational project.</p> <p>EA1N/EA2 have already acquired or in the process of acquiring the freehold of the land in and around the Kiln Lane substation site by way of voluntary agreements. EA1N/EA2 are anticipating that the majority of the voluntary agreements will complete before the close of the Project's Examination period.</p>	<p>The Applicant is engaging with SPR in respect of areas where the land rights required for Sea Link overlap with those required for EA1N and EA2. Compulsory acquisition powers are required to ensure that National Grid can deliver the Friston substation should the land rights not be transferred to National Grid by SPR; and to deliver associated works, particularly the HVAC and HVDC cables.</p> <p>Discussions are ongoing between National Grid and SPR on how to manage land agreements in areas covered by the Order limits for all three projects and how to present ownership in the Sea Link documents.</p> <p>Whilst it is necessary to seek compulsory acquisition</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.4.2	N/A	Updating of the Book of Reference and Land Plans.	SPR, EA1N, and EA2 are continuously acquiring land and land rights within the Sea Link Order Limits in and around the Kiln Lane Substation as part of their projects. SPR has supplied National Grid with information identifying completed land purchases, including the provision of electronic shapefiles and signed transfer documents, to enable accurate updates to the Land Plans and correct recording of interests within the Book of Reference (“ BoR ”). SPR will continue to provide details of these	<p>powers within the Sea Link DCO to ensure the project is deliverable, National Grid would covenant not to exercise these rights against SPR's interest in land where the required rights have been secured through a voluntary agreement between the Parties and that agreement is not in breach. This principle applies to all land within the Order limits.</p> <p>The Applicant is engaging with SPR in respect of the areas where land rights required for Sea Link overlap with the Order limits for EA1N and EA2.</p> <p>The Applicant is aware that EA1N/EA2 have now exercised a number of the Option agreements in respect of the plots identified and confirm they are in the process of updating the Book of Reference in that respect. We will be able to confirm the affected plot numbers once this update has taken place.</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			<p>acquisitions to National Grid upon receipt of which National Grid have agreed to update the Book of Reference and Land Plans accordingly.</p> <p>The BoR (Version E) and the Land Plans – Suffolk (Version E) that were submitted by National Grid at Deadline 4 do not accurately reflect the extent of EA1NL, EA2L and SPRUKL ownership and interests within the Order limits.</p>	<p>The Applicant thanks SPR for providing relevant shapefiles to confirm the exercise of those options to circumvent the potential delays with Land Registry registration.</p> <p>It is the Applicants' preference to reach a voluntary agreement with SPR for any land rights required, as set out in the Application Document 4.2 (G) Statement of Reasons [REP4-013]. Powers of compulsory acquisition are therefore sought on a precautionary basis to ensure that the Proposed Project can be delivered should voluntary agreement not be possible.</p> <p>The Applicant will continue to engage with SPR and their professional representatives to endeavour to reach a mutually acceptable agreement on the land rights.</p>	

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.4.3	N/A	Exercise of the compulsory acquisition rights under the Proposed Project's DCO, if granted, in relation to the construction of the Friston Substation and associated National Grid realignment works.	SPR and National Grid are continuing to discuss and negotiate the land rights to be transferred to National Grid by way of a voluntary agreement and EA2L/EA1NL will be entering into a Transfer of Benefit Agreement ("ToBA") with National Grid to transfer the powers in the EA2/EA1N Development Consent Orders to construct the National Grid Kiln Lane substation along with the land rights. Drafting of the key ToBA document has begun and the transfer is anticipated to complete in Spring 2026. Once the ToBA completes, be it before the close of the Examination or after, there should be a requirement in the Development Consent Order	There is continuous evolution of information on land ownership and land rights and a Book of Reference will always represent a snapshot in time based on diligent enquiry completed until that date. National Grid must be able to deliver the project as applied for, including Friston substation and associated works. At present National Grid does not have the land rights necessary to construct the substation or connect into it and therefore the compulsory acquisition rights application must be maintained. National Grid will continue to engage directly with SPR to negotiate the land rights required. It should be noted that almost all DCO applications seek compulsory acquisition powers for land where voluntary agreements are progressing but have not yet been agreed. Without these	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			that the compulsory acquisition powers no longer required for these works should fall out of the Project's Development Consent Order. This could be drafted on a scenario basis similar to what was granted in the Norfolk Boreas Offshore Wind Farm Order 2021. If this fall away is not built into the Project's Development Consent Order, then fairly robust protective provisions will be required..	compulsory acquisition powers, the Sea Link project would not be deliverable in the event that the voluntary agreement is delayed or not agreed.	
3.4.4	N/A	SPR are concerned that National Grid's compulsory acquisition powers will override or interfere with SPR's interests over the land and/or delay or prevent the carrying out of construction works and/or maintenance of EA1N and EA2.	SPR has drafted bespoke Protective Provisions and provided these to National Grid. SPR have requested their rights and interests are protected in the DCO under the proposed Protective Provisions.	National Grid notes the request for Protective Provisions and will engage directly with SPR to suitably protect its assets.	Under Discussion
3.4.5	N/A	Transfer of land and rights to National Grid	Negotiations are ongoing to confirm the land and rights required for National Grid to construct the Friston Substation and associated	Negotiations are ongoing between the parties on the transfer of land and rights to	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			National Grid realignment works consented under the EA1N and EA2 DCOs.	National Grid outside the DCO process.	

3.5 Topic 5

Table 3.5 Topic 5 - Construction Impacts

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.5.1	N/A	SPR's surface water drainage, via a major proposed ditch diversion around the north of Friston Substation, will need to be crossed by cables entering from the north into Friston substation. This interaction will need to be managed.	<p>SPR's surface water drainage, via a major proposed ditch diversion around the north of Friston Substation, may be affected by the Proposed Project's cable installations.</p> <p>SPR has lodged its drainage Requirements Discharge Documents under Requirements 22 & 41 of the EA1N and EA2 DCOs, which includes a Surface Water and Drainage Management Plan, and an Operational Drainage</p>	<p>National Grid has been working closely with the SPR Team on the drainage proposals for the site and with standard agreements, is confident the Sea Link project will not adversely affect delivery of drainage proposals for the site.</p> <p>As described in Topic 2 above; National Grid is progressing routing of both the HVDC and HVAC cables in advance of when this is required for Sea Link in order to provide SPR with more</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			<p>Management Plan, both for the onshore substation area.</p> <p>Further collaboration is required to develop solutions to protect SPR’s drainage / flood mitigations around the Friston Substation and ensure EA2 and EA1N’s DCO obligations are not compromised. Other formal agreements may be required by SPR to be put in place to protect EA2 and EA1N’s interests. This is currently unclear at this stage of negotiations.</p>	<p>certainty. This routing is being determined taking into account landscaping, drainage and utility connections to the site.</p> <p>National Grid has no intention of developing drainage proposals for the Friston site that differ significantly from those being developed by SPR; and in the very unlikely scenario that Sea Link is delivered in advance of EA2 or EA1N, would aim to adopt the same approach, with minor amendments as required to enable the later development of EA2 or EA1N.</p> <p>Application Document 9.17.1 Suffolk Drainage Strategy has been developed to demonstrate alignment with SPR’s latest drainage proposals, including showing the single pond to be created in the south east corner of the site.</p>	

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.5.2	N/A	There is existing archaeology within SPR's written scheme of investigation area which the Proposed Project could interfere with.	SPR has provided to National Grid plans of all known archaeological constraints, which are being considered in the Proposed Project's designs.	<p>National Grid confirms receipt of information.</p> <p>National Grid has engaged with SPR and identified and considered the location of known heritage assets associated with EA1N/EA2 as part of the design development process. The results of geophysical survey and the locations and results of archaeological trial trenching undertaken for EA1N/EA2 have been provided to the Applicant by the Archaeological Advisor to the LPA from Suffolk County Council Archaeological Service so that all heritage constraints are understood and avoided as far as possible. The submitted written scheme of investigation for the EA1N and EA2 projects (REP6-005 in the examination library for the EA2 project) was reviewed during the mitigation design for the Proposed Project to ensure that conflict with known</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.5.3	N/A	Potential impact on badger setts, artificial badger setts, bat commuting hedge rows, bat commuting trees and hedge rows, reptile habitats and great crested newts positive ponds, as well as	SPR has provided to National Grid plans of all known ecological constraints, which are being considered in the Proposed Project's designs. An Ecological Management Plan for the onshore substation area has been prepared under Requirement 21 of the EA1N and EA2 DCOs. This Requirements	archaeological remains and agreed mitigation areas was avoided where possible. The impact of the Sea Link project on archaeology has been considered in full in the Sea Link Environmental Statement. Should the proposed project impact areas of Archaeology that have be left as preserve in situ by SPR, then National Grid will mitigate this as per the requirements of the Archaeological Advisor to the LPA from Suffolk County Council Archaeological Service	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
		ecological mitigation proposed by SPR.	Discharge Document was discharged in February 2026. The Proposed Project needs to properly evaluate potential ecological impacts and ensure that it doesn't harm the mitigation that is proposed by EA2 and EA1N.	<p>agreement with ecological mitigation plans developed by SPR until they are finalised and provided to National Grid with permission to use the information in the Sea Link application. SPR's ecological mitigation proposals are not yet final.</p> <p>National Grid has provided SPR with plans of the project and regularly provided feedback on how mitigation could be developed in a way that accommodates Sea Link</p>	
3.5.4	N/A	<p>There is potential for cumulative issues to occur during construction, particularly where the Proposed Project crosses EA2 and EA1N infrastructure and works in and around Friston.</p> <p>Cumulative impacts may include vehicle movements (including total daily movements), working time</p>	<p>There is potential for overlap of construction activities based on current construction schedules/ timeframes.</p> <p>A conflict of activities is more likely during the Proposed Project's onshore substation connection and cable works which are proposed to be when SPR are scheduled to be carrying out construction of the EA1N and EA2 onshore substations and surrounding infrastructure.</p>	<p>National Grid has considered the cumulative impact of the projects in its DCO application, including in the Environmental Statement.</p> <p>National Grid agree that close coordination of the programs of the two projects and ongoing discussions around the interaction of the project activities will need to be closely monitored</p> <p>National Grid is not intending to start works under the</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
		constraints, dust and noise pollution.	The Parties are working together to minimise cumulative effects of the projects. Continued communication is required to monitor schedules for temporary possession and main works construction. Coordinated monitoring and management will be required where significant cumulative construction impacts are identified.	Proposed Project (Sea Link) consent in the Friston area until at least Q2/Q3 2027. Should Friston substation be constructed as planned under the EA1N/EA2 consents then the impact from works undertaken by Sea Link at Friston would be limited to installation of the underground cables and minor connection works.	
3.5.5	N/A	Overlapping Work areas	SPR has requested that a Construction Interface Management Plan be agreed between National Grid and the SPR parties. The CIMP should outline how any potential overlap in construction activities will be managed.	Since there will be some overlap with the current known SPR programme, careful CDM and onsite coordination will be implemented to ensure the works for Sea Link do not negatively impact the SPR construction works. National Grid agrees that this could be agreed in a Construction Interface Management Plan or similar.	Under Discussion

3.6 Topic 6

Table 3.5 Topic 6 - Operational Impacts

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
3.6.1	N/A	Cumulative drainage / flood management	<p>Cumulative operational drainage needs to be managed between the projects to ensure the drainage systems and SuDS pond(s) to be put in place under EA2 and EA1N remain within their design limits, preventing an increase in flood risk to Friston.</p> <p>National Grid needs to confirm that there will be no drainage flow into the EA1N/2 SUDS basin or provide drainage modelling that confirms there are no impacts. National Grid also needs to confirm that Sea Link infrastructure will not impact designed flow paths to the SUDS basin. Formal agreements may be required by SPR to be put in place to protect EA2 and EA1N's interests. This is currently</p>	<p>National Grid agrees that operational drainage will be managed between the projects and has been working closely with SPR to review and feed into drainage proposals. The Sea Link DCO demonstrates that the project will not increase flood risk to Friston individually or cumulatively with the SPR projects.</p> <p>The HVDA and HVAC cables for Sea Link will be installed underground and their installation would not increase flood risk at Friston or elsewhere. National Grid is therefore only planning temporary drainage for the cable routes for the Proposed Project.</p> <p>The Friston Substation permanent and operation drainage, which forms part of</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			unclear at this stage of negotiations.	<p>the overall drainage on the site, will be in line with the SPR design being discharged with SCC/ESC.</p> <p>Application Document 9.17.1 Suffolk Drainage Strategy has been developed to support and align with SPR's latest drainage approach and the Sea Link project would not adversely affect drainage for the EA1N and EA2 projects.</p> <p>There would therefore not be any increase in cumulative operational drainage requirements in the area north of Friston in a 'with Sea Link' scenario compared to that assessed in the EA1N and EA2 consents.</p>	
3.6.2	N/A	There is potential for cumulative noise issues to occur on key receptors in and around the Friston Substation during the operational phases of EA2, EA1N	An Operational Phase Noise Management Plan – ONSS has been discharged under Requirement 12 and Requirement 27 of the EA1N and EA2 DCOs. The plan incorporates operational noise information provided by	No additional operational noise will be created by connecting the Proposed Project into the Friston (Kiln Lane) Substation.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
		and the Proposed Project.	<p>National Grid and sets out how operational noise will be managed in accordance with the cumulative operational noise limit prescribed in Requirement 27 of the EA1N and EA2 DCOs. SPR accept that Kiln Lane will not include transformers or other equipment that would run continuously. National Grid has provided specifications of the switchgear they plan to install at Kiln Lane and further information on the intended operation. SPR understands that all switches will be internal (i.e. within the main building), switch duration will be very brief (circa 75 milli-seconds), and switching events will be infrequent. As such, SPR accepts that the operation of Kiln Lane is expected to make a minimal contribution to cumulative operational noise under standard operation. Collaboration between the parties will be required to ensure that cumulative operational noise in and around the Friston substations</p>		

Ref	Relevant Application Document	Summary of Description of Matter	SPR Current Position	National Grid Current Position	Status
			is adequately managed to prevent over exposure at sensitive receptors.		

4. Approvals

Signed

On Behalf of National Grid

Name

Position

Date

Signed

On Behalf of ScottishPower Renewables (UK) Limited

Name

Position

Date

On Behalf of East Anglia ONE North Limited

Name

Position

Date

On Behalf of East Anglia TWO Limited

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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