

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.67: Draft Statement of Common Ground Between National Grid Electricity Transmission and National Grid Lion Link Limited (NGLLL)

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nationalgrid

Contents

1.	Introduction	1
1.1	Overview	1
1.2	This Statement of Common Ground	1
1.3	Role of National Grid Lion Link Limited in the DCO process	1
1.4	Description of the Proposed Project	2
	The Suffolk Onshore Scheme	2
	The Offshore Scheme:	3
	The Kent Onshore Scheme:	3
1.5	Format of Document and Terminology.	3
2.	Record of Engagement	5
2.1	Summary of discussions	5
3.	Areas of Discussion Between the Parties	7
3.1	Topic 1: Converter station site co-location and master planning	7
3.2	Topic 2: Cable Routes	15
3.3	Topic 2: Kiln Lane (Friston) Substation	17
4.	Approvals	18
5.	References	19

Table of Tables

Table 1.1 Abbreviations	4
Table 2.1 Pre-application discussions	5
Table 3.1 Converter station site co-location and master planning	7
Table 3.2 Cable Routes	15
Table 3.3 Kiln Lane (Friston)	17

Version

Date	Version	Status	Description / Changes
November 2025	A	DRAFT	Issued to PINS for Deadline 1
March 2026	B	DRAFT	Issued to PINS for Deadline 5

1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 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 National Grid Lion Link Limited (NGLLL). 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 has been discussed at a number of meetings and individual by the Applicant and NGLLL. The SoCG will be further updated between Deadline 5 and Deadline 7 as the final points become agreed.
- 1.2.3 For the purpose of this SoCG, National Grid and NGLLL will jointly be referred to as the “Parties”. When referencing the NGLLL alone, they will be referred to as “the Consultee”.

1.3 Role of National Grid Lion Link Limited in the DCO process

- 1.3.1 NGLLL is part of National Grid Ventures (NGV) and sits within the National Grid Group of companies operating in the UK; NGV runs separately from National Grid plc’s core regulated operations. LionLink is a new interconnector (offshore hybrid asset) between the National Transmission Systems (NTSs) of GB and the Netherlands, including a connection into a wind farm located in Dutch waters. An offshore hybrid asset combines interconnection with the transmission of offshore wind generation outside of GB territorial waters. This project is being progressed along the DCO process in the same geographical region as the Proposed Project. LionLink is proposing the construction of an HVDC Converter Station adjacent to the Sea Link Converter Station along with an HVAC Cable route in the same area as the Proposed Projects HVAC Cable Route.

- 1.3.2 Sea Link interacts with the development proposals of NGV's Proposed Project and is also looking to utilise the substation location that NGV are looking to connect to. Therefore, the consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between NGV and National Grid.
- 1.3.3 NGV has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the project and NGV's proposed assets within the 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.
- 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. 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 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
OHA	Offshore Hybrid Asset
NGV	National Grid Ventures
NGLLL	National Grid Lion Link Limited
PRoW	Public Right of Way
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 with the NGV

Date	Topic	Discussion points
06/08/2021	Introduction Meeting	Early discussion around a joint landfall and cable route with Nautilus and Eurolink (now LionLink).
July – Dec 2022	Consents Meetings	Monthly meeting discussing progress of the projects and potential areas of coordination.
08/04/2022	PINS meeting	Joint meeting with PINS presenting both projects.
28/04/2022	Meeting with ESC & SCC	Meeting with the Local Authorities to present and discuss possible coordination.
22/06/2022	PINS meeting	Joint meeting with PINS discussing coordination.
Jan - Dec 2023	Consents, Lands and H&S Meetings	Regular meetings continuing discussions with various disciplines.
31/03/2023	Suffolk Coast Electricity Cable Ecology Group	Joint meeting held with RSPB and SWT.
24/08/2023	Technical Catch up	Converter Station Locations within the converter site, along with Cable Routes and access.
19/09/2023	Technical Catch up	Further discussions on the status of the projects, locations of Converter Stations and Cable routes and access.
17/10/2023	Consents Design Workshop	Meeting to discuss the consenting strategy and design considerations for the proposed Friston substation, AC cables and Converter station.
13/12/2023	Consents Design Workshop 2	Meeting to discuss the consenting strategy and design considerations for the proposed Friston substation, AC cables and Converter station.
19/01/2024	Coordination Meeting	Meeting to discuss the co-ordination of the two projects, where we can co-ordinate physical infrastructure, where we can avoid each project and the overall Co-ordination strategy between NGV and NGET.
23/01/2024	SHEQ Meeting	Initial meeting to discuss working on site, communication, training and various other areas.
14/02/2024	NG/NGV Coop Agreement Meeting	Consents teams discussing the Coop Agreement.
15/02/2024	Fortnightly Progress / Coordination Meeting	Ongoing meeting to discuss coordination and project updates.
19/02/2024	NG/NGV Coop Agreement Meeting	Consents and Lands teams discussing the Coop Agreement.
11/03/2024	Consents Meeting	Consents teams discussing progress.
23/04/2024	Meeting with ESC & SCC	Meeting with the Local Authorities to present the masterplan.

Date	Topic	Discussion points
24/04/2024	NGV/NGET Master Plan Meeting	Meeting to discuss the Masterplanning of the layout for the coordinated converter site including LionLink and Nautilus.
30/04/2024	Suffolk Coast Electricity Cable Ecology Group	Joint meeting held with RSPB and SWT.
08/05/2024	NGV/NGET Master Plan Meeting	Follow up meeting to discuss further details and review initial layouts from the Architects.
21/05/2024	SPR/NGV/NGET Coordination Meeting	In Person meeting to discuss all projects in the area and the coordination of works and programs where possible.
29/05/2024	Archaeology Meeting	Meeting to discuss Trial Trenching locations and possible geophysics data sharing.
05/06/2024	Meeting with ESC & SCC	Meeting with the Local Authorities to present the masterplan.
20/06/2024	Suffolk Coast Electricity Cable Ecology Group	Joint meeting held with RSPB and SWT.
21/08/2024	Pre meeting on Masterplan	Pre meeting ahead of presentation of masterplan to LPAs.
05/06/2024	Meeting with ESC & SCC	Meeting with the Local Authorities to present the masterplan.
06/06/2024	Archaeology Meeting	Aim is to produce a combined trial trenching plan to issue to Land agents / landowners to begin dialogue.
21/08/2024	NGV/NGET Master Plan Meeting	Follow up meeting to discuss further details.
April -Oct 2025	Consents Meeting	Monthly meeting until October 2025. All then attend coordination meeting (*).
June 2025 onwards	Coordination meeting (*)	Monthly meeting still ongoing (first meeting 05/06/25 face to face in London)
25 th Feb 2026	SoCG meeting	Meeting to discuss the points in the SoCG.

3. Areas of Discussion Between the Parties

3.1 Topic 1: Converter station site co-location and master planning

Table 3.1 Converter station site co-location and master planning

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
3.1.1	N/A	Colocation and reduced Cumulative Impact.	A collocated site with the potential to accommodate up to three (position at time of submission) converter stations provides an opportunity to explore a coordinated approach to overall site design. This could include shared infrastructure, mitigation, construction phasing, and temporary access which as a consideration of good design could in principle reduce the cumulative impacts of siting of multiple infrastructure assets at other locations.	NGLLL agree with the principle of reduced cumulative impacts. Notwithstanding NGLLL is yet to undertake its cumulative assessment which will be submitted as part of its DCO submission.	Agreed
3.1.2	N/A	Converter Sation Site Identification.	The Parties have undertaken a joint review to assess the feasibility of developing a	Agree with NGET position. Following the joint review NGLLL undertook its own shortlisting of	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
			<p>coordinated solution for up to three converter stations (Sea Link, Nautilus (Position at time of submission), and LionLink) to be co-located on a single site. Converter station sites identified by individual projects (Sea Link, Nautilus, LionLink) were reassessed as part of a backcheck as to whether they could support or be extended to support colocation of multiple projects. This assessment, and resulted in the identification of seven sites. NGET progressed further assessment of these sites culminated in the selection of a single collocated site, standalone or collocated culminated in the selection of a single co-located converter site at Saxmundham, identified as being suitable for Sea Link as a standalone project and up to two further converter stations.</p>	<p>converter station sites which resulted in four converter station sites being taken to the LionLink non-statutory consultation. Following the LionLink non-statutory consultation, further assessments identified the converter station site at Saxmundham as being the preferred site for LionLink as a both a standalone and collocated site with up to two further converter stations.</p>	

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
3.1.3	N/A	Nautilus Interconnector.	<p>Agree with NGLLL position.</p> <p>Given the design fix required to progress to DCO submission, the Nautilus Interconnector project remained a valid consideration in the Sea Link DCO application documents.</p>	<p>The Nautilus Interconnector project being developed by National Grid Ventures is now proposed to connect into the UK electricity system at the Isle of Grain in Suffolk and will no longer connecting in Suffolk.</p> <p>As such, LionLink has progressed its recent design refinement and statutory consultation of the basis of only two coordinated converter stations (Sea Link and LionLink).</p>	Agreed
3.1.4	N/A	Developing a converter station site master plan.	<p>Following the converter station site selection process and agreement on a shared converter station site for Sea Link and LionLink, NGET commenced a design process which considered the Sea Link converter station comprehensively as part of a wider master-planned site for up to three converter stations.</p> <p>The masterplan is illustrative, and explores and demonstrates how up to three converter stations</p>	<p>Agree with NGET position.</p> <p>NGLLL has further developed the 'Sea Link Converter Station Masterplan' as part of its ongoing design development and in the production of documents presented at the LionLink Statutory Consultation. The LionLink masterplan maintains the principles within the Sea Link document whilst also taking account of the evolving design (including an update to consider up to two Converter Stations following the confirmation Nautilus will no longer connect at</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
3.1.5	N/A	Phased Construction (including construction Compounds) and Landscaping Approach	<p>The Sea Link Masterplan takes account of the likely phasing of works for each project which were being discussed at the time of the Sea Link DCO Submission. This includes the location of construction compounds (reflected in the powers sought via the Order) which includes three possible locations for the Sea Link converter station construction compound, providing flexibility for future design and siting of the NGV projects' converter stations. The masterplan also identifies a strategy for mitigation planting, access roads, retention of public rights of way that exist within</p>	<p>Kiln Lane Substation, and further refinement of the LionLink project. The resultant masterplan is presented as part of the LionLink Statutory Consultation material, published on 13 January 2026.</p> <p>Following the removal of Nautilus as a project at the converter station site, discussions are ongoing regarding the location of preferred compounds for each project.</p> <p>The interfaces between the construction project components and timeframes through delivery will continue to be reviewed and discussed at regular intervals to confirm and align phasing of the converter station site development and associated landscaping.</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
			and surrounding the site, and drainage.		
3.1.6	N/A	Site access	Access to the converter station is proposed via a new access road from the B1121 south of Saxmundham and includes the crossing of the River Fromus. This new access road could be adapted (and extended as required) to access the LionLink converter station site subject to the access strategies and design requirements. This would reduce the land and infrastructure required from a separate access and has the potential to reduce environmental impacts from having separate accesses.	LionLink agrees with the principle of a shared access road to the Converter Station Site, and the potential for this shared access to reduce the land and infrastructure required, and the associated environmental impacts from each project having separate accesses.	Agreed
3.1.7	N/A	Limits of Deviation	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	There is currently an overlap between the Sea Link DC cable Limits of Deviation and the proposed Lionlink Converter access road. Discussions are ongoing on these interfaces to avoid potential conflicts and	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
				support the delivery of both projects.	
3.1.8	N/A	Converter and PROW diversion (the masterplan includes for phasing for landscaping, but we're not clear if this also includes PROW)	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	Discussions are ongoing to further consider the Lionlink Masterplan and the Sea Link temporary and permanent PROW diversions, to enable a refined approach to diversions during construction and operation.	Under Discussion
3.1.9	N/A	Drainage (temp and perm for compounds and converters)	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	Sea Links temporary Drainage is currently shown in the location of the Lionlink cable route, further discussions will be required on the design of both projects and construction phasing to develop a solution that works for both projects.	Under Discussion
3.1.10	N/A	Site levels / Cut and Fill	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	Sea Link has set the site level for its Converter and surrounding area based on the survey information it has obtained during the development of the project. Lionlink are currently working on confirming their levels for their	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
				converter station. Further discussions are required to confirm the cut and fill requirements of both the projects as part of wider engineering and landscape discussions to establish levels, and refine construction and landscaping proposals across the wider converter station site.	
3.1.11	N/A	Whilst broad-phasing is agreed, detailed plans aligned to construction programmes are still to be defined.	The Applicant can confirm ongoing discussions with NGLLL will continue as their programs develop.	Lionlink is giving further consideration to its construction programme which will be progressed post the analysis of its statutory consultation responses and further design development. Once available this will be reviewed by both projects to identify and constraints and opportunities.	Under Discussion
3.1.12	N/A	Transfer of land rights / permissions are still to be agreed (or the mechanisms by which this will occur)	The Applicant can confirm these discussions will be ongoing as both project develop.	As a result of the nature of the colocation, there are overlapping Order Limits between the projects with a resultant requirement to transfer land rights from Sea Link to LionLink. The exact extent of land is to be finalised and discussions are progressing to identify the	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	The Applicants Current Position	NGLLL Current Position	Status
3.1.13	N/A	Benhall Rail Bridge Survey are remediation	The Applicant has discussed its proposed survey works with NGLLL and the possibility of any remediation to the bridge. As this develops the Applicant will continue to discuss these matters for a coordinated approach to the access route.	mechanism for the transfer of land and/or rights.	Under Discussion

3.2 Topic 2: Cable Routes

Table 3.2 Cable Routes

Ref	Relevant Application Document	Summary of Description of Matter	The Applicant Current Position	NGLLL Current Position	Status
3.2.1	N/A	HVAC Cable Corridor	Sea Link are in the process of refining the design of their HVAC and HVDC cable corridor between Friston Substation and the Converter Site. Further Archaeological works have been carried out and coordination works are ongoing with SPR to minimise the impact on their landscape planting. Should Sea Link be able to install their cables in the southern half of their limits of deviation then Sea Link are happy to agree a midline to allow Lionlink to share the HVAC corridor. Further design and layout works is to be carried out.	NGLLL currently are consulting on two HVAC cable routes from the converter site to the Friston (Kiln Lane) Substation. The shared corridor route is preferred from a LionLink project perspective. Discussions are continuing to agree a midline position between the projects to reduce environmental impacts on this shared corridor and on residential receptors and the EA1N and EA2 landscape planting proposals.	Under Discussion
3.2.2	N/A	Sea Link Landscaping and Lionlink HVAC Cables.	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	Sea Link's DCO submission has landscaping proposed to the West of the Converter Site around its HVAC and HVDC Cable corridors to	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	The Applicant Current Position	NGLLL Current Position	Status
3.2.3	N/A	Sea Link and Lionlink Installation cable crossings interface.	The Applicant can confirm ongoing discussions with NGLLL will continue as their design develops.	As per the Sea Links Coordination document, should consent be in place for both projects, and the construction programmes be, or can be amended to align at cable crossing interfaces, subject to the appropriate commercial agreements NGLLL are happy to explore the opportunity for Sea Link to install ducting or other apparatus for Lionlink to reduce construction impacts	Under Discussion

3.3 Topic 2: Kiln Lane (Friston) Substation

Table 3.3 Kiln Lane (Friston)

Ref	Relevant Application Document	Summary of Description of Matter	NGV Current Position	NGET Current Position	Status
3.2.1	N/A	Kiln Lane (formerly known as Friston) Substation construction under the Sea Link DCO (Scenario 2).	Should Sea Link build the Friston substation under Scenario 2 within the Sea Link DCO we will ensure coordination with Lionlink for the cable entries and required bays subject to the appropriate planning permissions.	The position is noted. NGLLL are progressing discussions with NGET regarding the design of the Kiln Lane substation to accommodate LionLink, this includes the routing of the LionLink HVAC cables.	Under Discussion

4. Approvals

Signed

On Behalf of

Name

Position

Date

Signed

On Behalf of

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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