The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submission

Document 9.57: Statement of Common Ground Between National Grid Electricity Transmission and Northumbrian Water.

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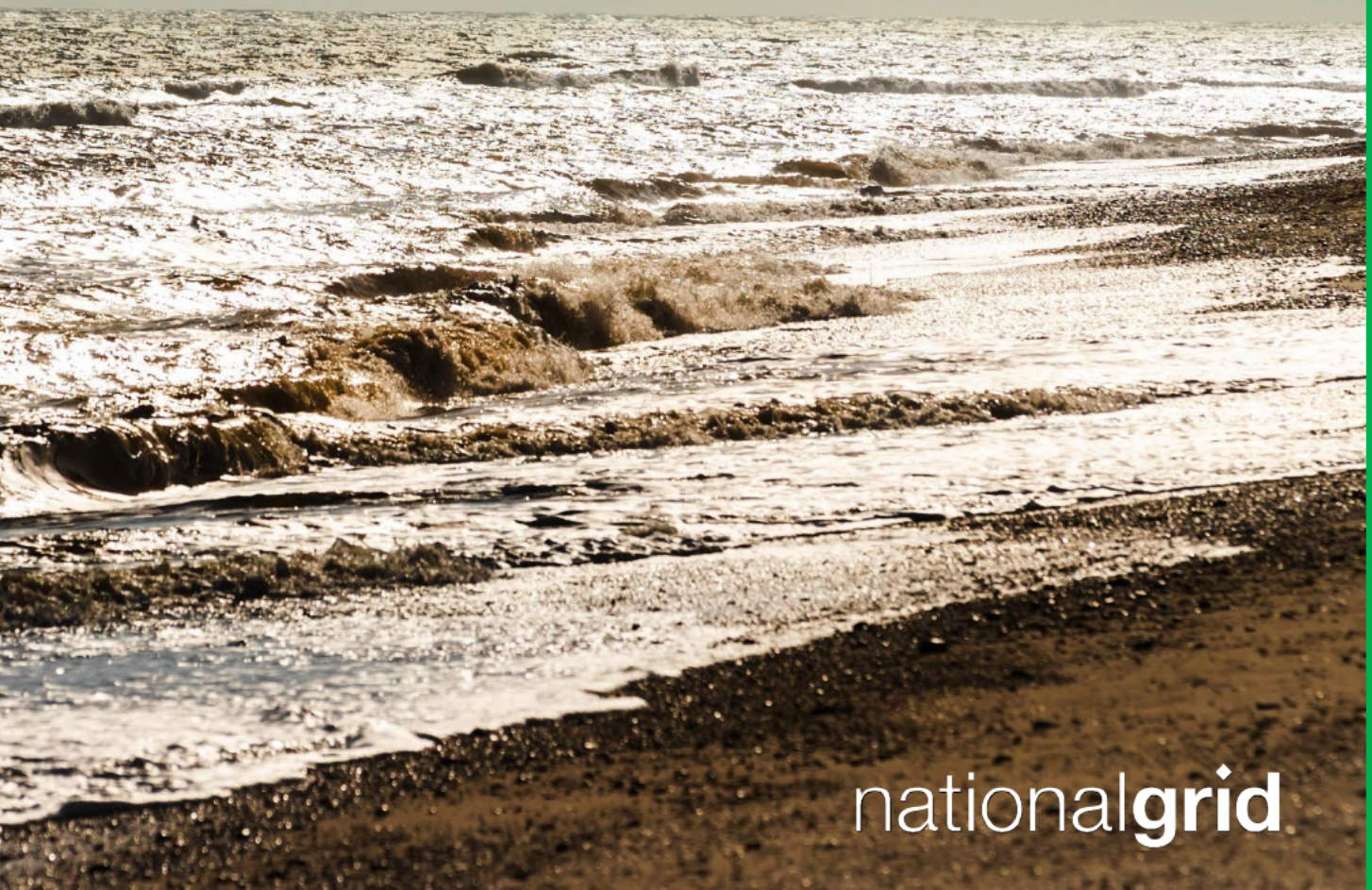

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Date	**Version**	**Status**	**Description / Changes**
November 2025	A	Draft	Issued for Deadline 1
March 2026	B	Draft	Issued for Deadline 5
April 2026	C	Final	Issued for Deadline 7

1. Introduction

1.1 Overview

1.1.1 The application for the Sea Link Project ("Proposed Project") was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025 ("Application").

1.1.2 Northumbrian Water Limited ("NWL") are landowner, statutory undertaker and a Statutory Party for the purposes of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 and have given notice that it is to be considered an Interested Party for the purposes of the Proposed Project pursuant to Section 89(2A) (b) of the Planning Act 2008].

1.1.3 The Proposed Project in as originally proposed will deleteriously impact on the assets and operational concern of NWL.

1.1.4 This Statement of Common Ground ("SoCG") has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid Electricity Transmission Ltd (“the Applicant”) and NWL relating to the Proposed Project.

1.1.5 The aim of a statement of common ground between parties in the development consent process is to inform the Examining Authority of the status of the matters at hand and will allow the Examining Authority to focus their questioning and provide clarity for all participants in Examination.

1.1.6 This SoCG is agreed between the Applicant and NWL (together the "Parties") and 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). It will be progressed during the pre-examination and examination periods by the Parties with the aim of agreeing actions to avoid or reduce the implications of the Proposed Project on NWL's affected assets and may also be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.

1.2 Role of Northumbrian Water in the DCO process

1.2.1 Essex and Suffolk Water is a trading name of NWL, a company registered in England and Wales, which is a member of Northumbrian Water Group Limited ("NWGL"). The principal regulated company in the NWGL is NWL, which is a directly wholly-owned subsidiary of NWGL, and operates in the north east of England as ‘Northumbrian Water’ and in the south east of England as ‘Essex & Suffolk Water’.

1.2.2 NWL is the regional water and sewerage undertaker and has assets as well as other operational concerns and interests within the Proposed Project's order limits. The role of NWL for the purposes of the DCO application process is set out in paragraph 1.1.2 of this Statement.

1.3 Format of Document and Terminology.

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

1.3.2 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.

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

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
HV	High Voltage
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way
TJB	Transition Joint Bay

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.

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.

2.1.2 The Applicant has continued to discuss the SoCG with the Consultee and also Protective Provisions to be placed on the face of the DCO. Some of the below section may have been superseded by the Protective Provisions.

Table 2.1 Record of meetings and correspondence with Northumbrian Water

Date	Topic	Discussion points
03/08/2022	*Initial consultation email*	*Initial consultation email sent to NWL. 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 NWL's assets.*
31/08/2022-13/09/2022	*Email chain*	*NWL requested CAD files to review and assess crossing points. Response from engineering team stating that the Proposed Project is not at a stage to share CAD files. NWL acknowledged this stating that they will review the proposals.*
24/10/2022	*Update email*	*Email sent NWL containing Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0460) and Pro Forma (SEAL-MMD-SEAL-ENG-REP-0459) to be reviewed.*
Oct – Dec 2022	*Non-statutory Consultation*	*A period of non-statutory consultation was held between, the 24th 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.*
14/02/2023	*Follow-up email*	*Email sent to seek progress on the Pro Forma sent to NWL by the Proposed Project's engineering team at the end of 2022.*
16/03/2023	*Pro Forma response*	*Reply received including completion of the Pro Forma (SEAL-MMD-SEAL-ENG-REP-0459). Accompanied with drawings and documents providing information to aid in the re-alignment of HV cables.*
19/10/2023	*Consultation meeting*	*Meeting chaired by the Proposed Project's engineering team with NWL. Updated cable alignment drawing shared and crossing interfaces discussed.*
Oct – Dec 2023	*Statutory Consultation*	*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.*
July 2024	*Targeted Consultation*	*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.*

Date	Topic	Discussion points
03/01/2025	*Protective provisions email*	*Email to NWL inquiring if they have any proposed protective provisions.*
09/01/2025	*Proposed Project update email*	*Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0460 P03) issued to NWL alongside a design update document 'SEAL-MMD-SEAL-ENG-TCN-0748' for review.*
30/01/2025	*Proposed Project update email response*	*NWL responded to the Proposed Project update email stating that they will need to discuss a consultation fee estimate.*
21/02/2025	*Proposed Project update meeting*	*Meeting confirmed for the 25 of February between the Proposed Project's engineering and consents team and NWLto discuss the Proposed Project update.*
03/03/2025	*NWL high level assessment of the Proposed Projects proposals*	*Meeting with NWL to discuss the proposed developments and what the Proposed Project would like from them. NWL to provide a cost estimate for consultation on the proposed works and to review the design update document 'SEAL-MMD-SEAL-ENG-TCN-0748' and provide comment.* *Email from NWL providing details of a high level assessment of Sea Link's proposals and have produced an estimate for consultations. Attached to the email were the following documents* • *Sea Link Budget cost Letter 03.03.25* • *BACS Payment Details* • *Conditions for excavating Near NWL Assets* • *Sea Link - Consultation Fees Budget Cost Summary* *The total cost relating to:* • *Asset impact assessment* • *Investigative exercises* • *Supervisor/Supervision/Site visits* • *Administration/Project management* • *Legal support for protective provisions* • *NWL/Mott Macdonald meetings.*
14/03/2025	*Consultation fee meeting*	*MS teams meeting with NWL to understand the breakdown of the proved consultation fee. Mainly to establish what is covered by the legal fees and what stages of the design they have priced their consultation for.*
25/03/2025	*Consultation fee meeting*	*MS teams meeting with NWL to discuss payment options of the consultation fee. NWL stated that payments are usually given in one lump sum.* *It was noted that many of the items covered in the consultation would be required when the Proposed Project designs are developed further. At this stage, the Proposed Project will share the statement of common ground to establish an understanding of the*

Date	Topic	Discussion points
		matters between both parties. NWL agreed to share the statement of common ground with their legal team for comment.
21/05/2025	*Meeting to discuss the consultation fee with a project update.*	*MS teams meeting with NWL to discuss their consultation fee and updates with the Proposed Project's engineering team. The meeting discussed the Proposed Project's current status and NWL Group's involvement. NWL requested clarity on the scope of work required to support the project, particularly regarding a cost estimate submitted in March 2025. The Proposed Projects' engineering team clarified that some quoted activities, like supervision and site visits, are not yet needed. NWL stated they cannot proceed without payment. The engineering team will confirm with National Grid the specific commitments required from NWL and provide a scope. NWL will then review and reprice accordingly.*
23/05/2025	*Update and following previous meeting*	*Email to NWL confirming what the Proposed Project requires from them at this stage that is a review of comment on the Statement of Common Ground and Design Interface Document.*
10/06/2025	*Cost estimate for continued discussion received*	*Email from NWL providing a revised cost estimate for further consultation regarding the Proposed Projects Interfaces with their assets.*
16/10/2025	*Updated design interface document issued*	*Following changes in design during the pre-examination phase, an updated design interface document, SEAL-MMD-SEAL-ENG-TCN-0748_P02 was issued to NWL for their review.*
12/11/2025	*Response to design interface document*	*NWL undertook its own interface assessment between their assets and the Proposed Project using the issued design interface document (SEAL-MMD-SEAL-ENG-TCN-0748_P02) and published plans for the Proposed Project. This was sent to the Proposed Project's engineering team to review. It is now anticipated that the SoCG will be used to communicate the status of ongoing conversations.*
04/12/2025	*Protective Provisions*	*Email from NWL's legal team to the Applicant's legal team providing proposed protective provisions.*

3. Areas of Discussion Between the Parties

3.1 Interfaces with Northumbrian Water assets

Table 3.1 Interfaces with Northumbrian Water assets

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
3.1.1	N/A	S/UT/W/002 - Trenchless crossing of 250mm Polyethylene ("PE") Distribution Main	Clearance of 1m required between the existing main and the proposed asset. NWL to be provided with confirmation of the location of construction compounds and reception/launch pits to confirm any requisite protection measures.	Minimum 1m clearance required. Landfall drills will be at depth and monitored throughout drilling process.	Not Agreed.
3.1.2	N/A	S/UT/W/0016 – 8" PVC Distribution Main	Minimum 1m clearance required between the existing main and the proposed asset. PVC mains are fragile and require additional care. No form of ducting/protection or intrusive excavation to be	Main to be ducted with 12 m span across interface. Minimum 1 m clearance to be accommodated for both bellmouth and HVDC cable, hence the alignment will deviate from the standard installation.	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			carried out until a trial hole has been conducted (as approved by NWL) and any requisite protection measures confirmed.	Noted that AC and SI mains are fragile and require additional care.	
3.1.3	N/A	S/UT/W/0018 – 4" Spun Iron ("SI") Distribution Main	NWL noted that the proposed HVDC cable depth of 900mm overlaps with the typical depth range of water mains in agricultural land. A trial hole must be conducted (as approved by NWL) to ascertain the deviation of the standard installation in order to confirm if the methodology is acceptable and if any protection measures are required.	The Applicant will continue to liaise with NWL to arrange site investigations at the construction phase of the project to positively identify the location of NWL assets in location and depth.	Not Agreed.
3.1.4	N/A	S/UT/W/0041 – 4" Asbestos Cement ("AC") Distribution Main	The temporary bellmouth entrances and haul road may impose surface loads and vibrational stress, which can compromise the structural integrity of the pipe.	Build-up of the haul road should provide clearances to assets. Additional protective haul road matting to be installed for further protection.	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			This part of the proposal is under review and depending on the outcome, a trial hole (to be carried out as approved by NWL) may be required to ascertain the requisite protection measures.		
3.1.5	N/A	S/UT/W/0064.1, S/UT/W/0064.2, S/UT/W/0064.3, S/UT/W/0064.6, and S/UT/W/0072 - Haul road interfaces with 250mm PE Distribution Main that runs parrel with the B1119.	Where a road is to be constructed above the existing main, a concrete raft is normally required over the main. Where plant and machines have to cross over a strategic main and precautions are needed to protect the main from damage, these must be approved beforehand. Protective slabs must be avoided due to the difficulty in excavation, delayed emergency access, and impaired leak detection, which can compromise operational response times.	Protective haul road track matting is to be installed to protect buried assets in any areas where the existing track alone is not suitable. Where a new bellmouth is required composition of the bellmouth will provide sufficient clearance to the utility due to subbase and surface profile. Protective matting to be installed during initial mobilisation to bridge structure along existing access to Wood Farm. Outfall pipes crossing this main to reach the ordinary watercourse will do so at a	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			A trial hole (carried out as approved by NWL) may be required depending on the proposals for the haul road. The attenuation pond is positioned directly over the asset, which violates best practice for underground utility protection and contravenes the Street Works UK guidelines that recommend maintaining clear vertical and horizontal separation from surface infrastructure. Details of the outfall pipe must be confirmed to confirm any requisite protection measures.	perpendicular angle with an agreed clearance. The use of protective slabs/rafts is to be determined at detailed design. The design of the attenuation pond is indicative and would not be placed over the existing NWL assets, once location of the pipes is confirmed on site. The Applicant's position to be approved by NWL.	
3.1.6	N/A	Induced Voltage	Concern raised with regard to any induced voltages produced from the cable. The calculations provided by the Applicant must (at this time) be reviewed by NWL's consultants and	The HV cables cross assets as close to 90 degrees as possible. Further calculations to address concerns raised will be assessed in the later stages of the Proposed Project.	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			any concerns addressed to confirm requisite protection measures.		
3.1.7	N/A	Heat radiation from the cables	Water passing through the proposed pipes should remain underneath 20ºC at all times.	Cable system design, which will be carried out at a later stage of design, will identify the temperature produced by the cables and different depths. Where possible, cables will be located sufficiently away from the asset to reduce risk of increasing heat. Where this this is not possible further discussion will take place to determine next steps.	Not Agreed.
3.1.8	N/A	Interface angle	The proposed cables should pass underneath NWL's assets in all cases. The impacted assets have not been identified/referenced by the Applicant. The mains are not to be ducted until trial hole investigations have been conducted (as approved by NWL) and	Only four interfaces between assets and Sea Link cable. Subject to the positive identification of the assets to be crossed inline with the method set out by NWL the applicant will review the crossing of each asset and agree with NWL the method to be used.	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			designs/methodology has been agreed to ascertain the requisite protection measures.		
3.1.9	N/A	Interface with landscape works and planting	Hedgerow planting near the track must be carefully managed to avoid encroachment into the statutory easement, which could restrict future access for maintenance or emergency repairs. A site inspection and depth verification must be carried out (as approved by NWL) to confirm compliance and ensure the asset remains unaffected by the proposed works.	The applicant will review all landscape mitigation planting in the vicinity of any NWL assets with NWL before completing any final plans to be agreed by the Authorities.	Not Agreed.
3.1.10	N/A	S/UT.W/0097 and S/UT.W/0097.1- Interface with assets within the Benhall Rail Bridge	Temporary bellmouth entrance is expected to clash with the existing asset, violating recommended minimum separation and depth standards outlined in	Where a new bellmouth is required composition of the bellmouth will provide sufficient clearance to the utility due to subbase and surface profile.	Not Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			Street Works UK guidelines. The presence of heavy machinery and construction activity would also impede access to the asset for routine maintenance or emergency repairs, increasing operational risk. Any damage to AC pipes can release asbestos fibres, posing serious health hazards during excavation or repair. The placement of a construction compound, in the field to the east, directly over the asset introduces surface loading, which can lead to pipe deformation or cracking. According to GIS records, the asset is situated over the bridge in a duct, which introduces specific engineering challenges in the context of the	Protective matting can be used for additional protection. Access and easements are to existing assets are to be dealt with through protective provision. The design of the construction compound is indicative and would not be placed over the existing NWL assets, once location of the pipes is confirmed on site. The use of Benhall Rail Bridge and any subsequent structural modification are still to be determined. Noted that the asset here is in a duct.	

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
			proposed bridge modifications.		

3.2 Construction matters

Table 3.2 construction matters

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.2.1	N/A	Locating the assets	NWL do not have details on the depths of their assets therefore investigations by the Applicant and their Contractors will be required to ascertain depth. Trial holes over assets (as approved by NWL) are required to confirm depths prior to detailed design.	All assets to be identified through trial holes with watching briefs.	Agreed
3.2.2	N/A	Backfilling of trenches	Where the pipe, sewer or drain is laid beneath a strategic main the backfilled material should be well compacted by hand to a minimum depth of 300mm	To be passed onto / confirmed with the contractor.	Not Agreed.

			above the top of the strategic main. The material used for backfilling must be fine grained, gravel or lean concrete.		

3.3 Proposed projects by Northumbrian Water

Table 3.3 Proposed projects by Northumbrian Water

Ref	Relevant Application Document	Summary of Description of Matter	Northumbrian Water Current Position	The Applicant Current Position	Status
3.3.1	N/A	New assets being installed	Position under review.	Ongoing. Any further updates to be provided by NWL.	Not Agreed.

3.4 Protective provisions

Table 3.4 Protective provisions

Ref	Relevant Application Document	Summary of Description of Matter	NWL Current Position	The Applicant Current Position	Status
3.4.1	N/A	Protective provisions	Asset protection agreement and Protective provisions are to be agreed between the Parties – awaiting comments from the Applicant's legal team on revised draft provided on 10 February.	Asset protection Agreement and Protective provisions to be agreed between the Parties. Negotiations are progressing on the draft and comments received from NWL on 10 February are being considered.	Not Agreed.

4. Approvals

Signed	
On Behalf of	National Grid
Name	James Buckley
Position	Senior Project Manager
Date	29/04/2026

Signed	
On Behalf of	NWL
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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