

Sea Link

Volume 9: Examination Submissions

Document 9.95 ~~Draft~~ Statement of Common Ground Between National Grid Electricity Transmission and Southern Water.

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1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.
- 1.1.4 This SoCG is between National Grid Electricity Transmission Ltd (“NGET”) and Southern Water Services Limited (‘Southern Water’) relating to the DCO application for the SEA Link Project. 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 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 Southern Water. The SoCG will evolve through the DCO process.
- 1.2.2 For the purpose of this SoCG, National Grid and Southern Water will jointly be referred to as the “Parties”. When referencing the Southern Water alone, they will be referred to as “the Consultee”.

1.3 Description of the Proposed Project

- 1.3.1 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.
- 1.3.2 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 400 kV 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:
- 1.3.5 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
- 1.3.6 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’.
- 1.3.7 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

1.4 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. The Parties have also indicated the likelihood that agreement will be reached on each item.
- 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
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
PRoW	Public Right of Way

Abbreviation/Term	Definition
SoCG	Statement of Common Ground
SPR	Scottish Power Renewables
TJB	Transition Joint Bay

2. Record of Engagement

2.1 Role of Southern Water in the DCO process

2.1.1 Southern Water provides water and wastewater services to East and West Sussex, Kent, Hampshire and the Isle of Wight by virtue of an appointment made under the Water Industries Act 1991. Their role during the DCO process derives from being a statutory consultee; as a prescribed consultee of the Planning Act 2008. The consultee should provide guidance and comments on the Sea Link proposal and co-own the Statement of Common Ground between Southern Water and National Grid.

Southern Water has been encouraged to discuss and work with the Applicant at the pre-application stage of the application process for the Proposed Project and Southern Water has existing assets within the Proposed Project's order limits.

2.2 Summary of pre-application discussions

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

2.2.2 The Applicant has been in detail negotiations with Southern Water over the Protective Provisions and these will be placed on face of the order at Deadline 7

Table 2.1 Record of meetings and correspondence with Southern Water Summary of discussions

Date	Topic	Discussion points
31/09/2022	Initial consultation	Initial consultation email sent to Southern Water containing a consultation document (SEAL-MMD-SEAL-ENG-TCN-0138) including the outline of the Proposed Project, interfaces with Southern Water and outline drawings of the Proposed Project.
Oct – Dec 2022	Non-statutory Consultation	A period of non-statutory consultation was held between, the 24th of October 2022 and 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	Initial consultation follow-up	Follow up email from the Proposed Project's engineering team to Developer.Services@southernwater.co.uk for comments on the document previously shared.
09/10/2023	Initial consultation meeting -set up	Meeting set up for 18/10/2023, original consultation document (SEAL-MMD-SEAL-ENG-TCN-0138) sent to Southern Water prior to the meeting for reference.
18/10/2023	Initial consultation meeting	Meeting between Southern Water and the Proposed Project's engineering team. See documents National Grid Electricity Transmission - Stakeholder Consultation Southern Water 20231018 and SEAL-MMD-SEAL-ENG-MOM-0665.
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

Date	Topic	Discussion points
		<i>information, and an update on how the proposals have developed since the last consultation in 2022.</i>
<i>06/11/2023</i>	<i>Statutory Consultation Response</i>	<i>Statutory consultation response from Southern Water sent to National Grid Electricity Transmission plc for the proposed sea link project - Protection of Southern Water Assets. The correspondence included a spreadsheet listing the SWS's assets/easements in proximity to the proposed works.</i>
<i>July 2024</i>	<i>Targeted Consultation</i>	<i>Proposed Project update since the close of statutory consultation in December 2023, and further technical and environmental assessments. As a result of this work, changes to the plans were shared.</i>
<i>03/01/2025</i>	<i>Protective provisions request</i>	<i>Email to graham.dunn@southernwater.co.uk and Sathikaran.Amuthaseelan@southernwater.co.uk asking for confirmation if Southern Water has any proposed Protective Provisions which they would like the Proposed Project to include as part of the Draft DCO.</i>
<i>08/01/2025</i>	<i>Design update email</i>	<i>Memorandum of Understanding Southern Water (SEAL-MMD-SEAL-ENG-REP-0742) P01 issued to Southern Water. Alongside, a design interface update document named 'SEAL-MMD-SEAL-ENG-TCN-0743' outlining the latest design for Southern Water to review</i>
<i>23/10/2025</i>	<i>Project Update Meeting</i>	<i>Southern Water requested a meeting to discuss the latest project development post submission of the DCO application. The Proposed Project team reviewed the layout plans with Southern Water and discussed the interfaces, as well as any areas of interest. It was agreed that the project would re-share the details of the interfaces (SEAL-MMD-SEAL-ENG-TCN-0743_P01) and transition the Memorandum of Understanding with Southern Water (SEAL-MMD-SEAL-ENG-REP-0742) into a Statement of Common Ground. Southern Water confirmed that it would likely require bespoke protective provisions for its benefit to deal with the potential impact on its interests and assets.</i>

3. Areas of Discussion Between the Parties

3.1 Topic 1 – Interface with Southern Water assets

Table 3.1 Interface with Southern Water assets

Ref	Relevant Application Document	Summary of Description of Matter	Southern Waters Current Position	The Applicants Current Position	Status
3.1.1	N/A	Clearance to assets	1m clearance dependent on asset type and condition. Non-destructive testing (NDT) likely required. Depending on the tolerance/accuracy of HDD, this may require further clearance in order not to clash with Southern Water’s existing assets.	NGET to review design of HDD with Southern Water to ensure at least 1 m clearance is achieved.	Agreed
3.1.2	N/A	Locating existing assets	Trial pits required to identify assets - RAMS and mitigation measures to be provided. Possible non-destructive testing (NDT) may be required at some locations.	Agreed – trial pits will be used to locate assets where required.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Southern Waters Current Position	The Applicants Current Position	Status
3.1.3	N/A	Proximity to raising and trunk mains within the field immediately east of A256	Further clarification on exact position of assets required. Possibility for Southern Water to undertake excavations	Excavations to locate assets are to be undertaken at the detailed design stage.	Agreed
3.1.4	N/A	Trenchless crossings	Southern Water preference for trenchless crossings to be perpendicular to assets, alignment dependent on landfall location.	The current alignment for the trenchless crossing is not perpendicular to the assets due to the limited space to drill from foreshore to landfall north of St Augustine's Golf course, but does cross at a near-perpendicular angle.	<u>Under Discussion</u> <u>Not Agreed</u>
3.2.5	N/A	Access roads	Ability for Southern Water to request and review Contractor Risk Assessment & Method Statements (RAMs) to ensure that proposed construction activities, plant operations and vehicular loading are fully evaluated and controlled so as to prevent any adverse impact on buried assets and associated infrastructure	Excavation required for new haul roads in the identified location of assets can be 'hand excavated' noting that the depths of assets is likely to exceed the depth of excavation, hence the asset is likely to not be exposed. It is then deemed that the build-up of the road will provide suitable protection to buried assets. Typically, where an existing road is to be used during the	<u>Under Discussion</u> <u>Not Agreed</u>

Ref	Relevant Application Document	Summary of Description of Matter	Southern Waters Current Position	The Applicants Current Position	Status
				<p>project, protective haul road track matting can be installed to protect buried assets in any areas where the existing road insufficiently protects the assets below. Where a new haul road is to be installed, in addition to the above, protection such as track matting will be installed to safeguard underground assets. Prior to installation, clearances for manual digging will be established in accordance with the asset owner's guidelines.</p>	

3.2 Topic 2 – Interface with Southern Water Land

Table 3.2 Interface with Southern Water Land

Ref	Relevant Application Document	Summary of Description of Matter	Southern Waters Current Position	The Applicants Current Position	Status
3.2.1	N/A	Use of Jutes Lane	Southern Water has provided the area over which they have current rights and have requested information on which activities Sea Link intends to undertake within this area. Southern Water would like to be consulted on any highways applications made that could impact upon access to Weatherless Hill Wastewater Treatment Works. Access is required by Southern Water 24/7.	It is likely that Jutes Lane, the access road to Weatherlees Hill Wastewater Treatment Works, will be required to undergo diversions and new connections, to facilitate the construction and operation of the proposed substation/ converter station. This may include street works within the road pending agreement on supplies. The applicant will consult with Southern Water in advance of any highways applications being made	Under Discussion Not Agreed
3.2.2	N/A	Use of Marsh Farm Lane	Marsh Farm Lane is an access road to Southern Water’s Minster Wastewater	Marsh Farm Road is to be used for access to the existing 400kV OHL on the north of the	Under Discussion Not Agreed

			<p>Treatment Works. Southern Water wish to be consulted on any highways applications made that could impact upon access to the site. Access is required by Southern Water 24/7.</p>	<p>river Stour. No works to Marsh Farm Lane are anticipated. Although protective haul road track matting can be installed to protect buried assets in any areas where the existing road alone is not suitable. The Applicant will consult with Southern Water Prior to any works effecting Marsh Farm Lane</p>	
3.2.3	N/A	<p>Temporary construction compound at 'Location 3' (Cottingham Lane)</p>	<p>Southern Water has confirmed that it has 1 ductile lined 500mm pipe (water) and twin 800mm rising mains (waste) in this location. It therefore requires protective provisions regarding this location to ensure that interfaces with these assets are not detrimental. Southern Water would like to be consulted (and approval needed) prior to the siting of the compound and carrying out of the works to ensure its assets are protected.</p>	<p>To install the compounds construction begins with securely fencing the site and removing / storing topsoil in bunds adjacent to the site. In Kent there is the potential for shallow archaeological features which may require the top soil to be left in situ as additional protection during the works. This will need to be agreed with all stakeholders following the outcome of ongoing site investigations. Should the top soil be left in-situ, an intensive remediation of the top soil would be required following completion of the works. Where stripping of the top soil has occurred, the compound area is excavated to the required formation level and the</p>	<p><u>Under Discussion</u> <u>Not Agreed</u></p>

associated material either stored in the same manner or removed offsite. The formation level is determined by the pavement thickness applicable to the individual ground conditions at each location. Where existing ground conditions are poor, the pavement layer will be thicker, and consequently a greater volume of excavation required or the compound will be raised above the existing ground level.

Once excavation has been completed, a geomembrane separation layer and a geotextile reinforcement layer (often as a combined composite layer) will be laid, followed by compacted layers of stone. The majority of the compound will be left as natural stone, however, car parks may be surfaced with a bituminous surface layer to prevent damage to road going vehicles. Alternatively, soil stabilisation may be employed, where the existing ground is chemically strengthened allowing the volume of imported stone to be reduced. Soil stabilisation is normally

undertaken by specialist contractors, with the stabilisation reversed following completion of the works.

The layout of the compound will be configured to avoid excessive loading at the location of the utility corridor.

The HVDC cable is proposed to be a back-to-back HDD with the marine cable. Therefore, the marine HDD will be received and another HDD will be launched from the construction compound and route under the assets in this location, as the drill heads beneath Richborough Way to the construction compound to the northwest. A minimum clearance of 1m to the Southern Water assets is to be accommodated for.

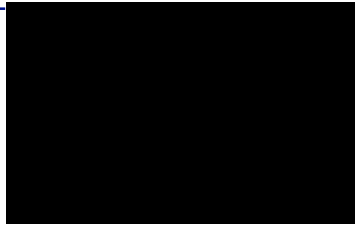
There is additional optionality to have a continuous HDD from the foreshore that will land on the north west side of Richborough Way, negating the need for a compound to the south east. Hence, if this option is used there will not be any interface with the construction compound as it

will not be needed. However, the continuous HDD will still need to cross the utilities. This will be done in same manner as a back-to-back HDD with an agreed clearance to the existing utilities.

The applicant is happy to discuss protective provisions with Southern Water.

4. Approvals

Signed



On Behalf of

National Grid

Name

James Buckley

Position

Senior Project Manager

Date

29/04/2026

Signed

On Behalf of

Southern Water

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>

