

# Sea Link

Volume 9: Examination Submissions

Document 9.58: ~~Draft~~Final Statement of Common Ground Between National Grid Electricity Transmission and River Stour (Kent) Internal Drainage Board.

Planning Inspectorate Reference: EN020026

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## Sea Link Document Control

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# 1. Introduction

## 1.1 Overview

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

## 1.2 This Statement of Common Ground

- 1.2.1 This SoCG is between the Applicant and the River Stour Internal Drainage Board (‘River Stour IDB’). 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 The SoCG has been received back from the River Stour IDB and comments have now been incorporated, this is going through internal review and will be issued back to the River Stour IDB for comment by the end of November 2025.
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and River Stour IDB and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.
- 1.2.4 For the purpose of this SoCG, National Grid and the River Stour IDB will jointly be referred to as the “Parties”. When referencing the River Stour IDB alone, they will be referred to as “the Consultee”.

## 1.3 Role of the River Stour IDB in the DCO process

- 1.3.1 The Consultee is a Land Drainage Authority and supervising body under the Land Drainage Act 1991. The River Stour (Kent) Internal Drainage Board is a public sector organisation, responsible for flood protection and land drainage in the Stour Catchment in East Kent. The Drainage District stretches from Lenham Heath in the far west to Richborough and Deal in the East, and from Sellinge in the south, up to Reculver in the north.

- 1.3.2 The Consultee should provide guidance and comments on the Sea Link proposal and co-own the SoCG Statement of Common Ground between the Consultee and ~~the Applicant~~ National Grid.
- 1.3.3 The Consultee has been in discussion with the Applicant at the pre-application stage of the application process for the proposed project and the Consultee has consenting and enforcement powers in relation to existing watercourses within the proposed project's order limits.

## 1.4 Description of the Proposed Project

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

### The Suffolk Onshore Scheme (Not relevant to River Stour IDB)

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high

plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.

- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

## The Offshore Scheme:

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

## The Kent Onshore Scheme:

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

1.4.8 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.

## 1.5 Format of Document and Terminology:

1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the proposed project.

1.5.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed', ~~'not agreed but not material'~~, or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved. ~~'Not agreed but not material' indicates that although the parties have~~

~~not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed. 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**

<b>Abbreviation/Term</b>	<b>Definition</b>
DCO	Development Consent Order
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SPR	Scottish Power Renewables
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.

2.1.2 The Applicant has been working with the Consultee on updating the Drainage strategy to reflect their requirements therefore some of the areas in this document may be out of date.

**Table 2.1 Record of meetings and correspondence with River Stour IDB**

Date	Topic	Discussion points
26/08/2022	Initial consultation email	<p>Initial consultation email sent to the River Stour IDB. 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 the IDB's assets.</p> <p>River Stour IDB responded to confirm they received the document and will review.</p> <p><a href="mailto:Joe.Williamson@rsidb.org.uk">River Stour IDB Joe.Williamson@rsidb.org.uk</a> provided a shapefile zip folder of the watercourses within the River Stour IDB District: (RSIDB Watercourses and District.zip). Whilst requesting a GIS file of the route.</p>
28/08/2022	Initial consultation response	<p>The proposed project's engineering team sent a GIS file of Option 1 dated 14/10/22 (107414_SeaLink_Kent_Cable_Alignment_Option1_gdb_20221013) to <a href="mailto:Joe.Williamson@rsidb.org.uk">River Stour IDB Joe Williamson</a> for crossing review.</p>
12/09/2022	Email response	<p>River Stour IDB sent a map and related shapefiles to show where the proposed Sea Link infrastructure will be within 8m of an IDB maintained watercourse.</p> <p>'Although you will need the consent of our Drainage Board for any works that affect ANY non-main river watercourse in our District, those that have the potential to directly affect our management and maintenance are the works we would pay particularly close attention to. Although we appreciate the proposed project will still be in development, it must be ensured that all appropriate steps are taken to minimise the impact on the fluvial network; this is to ensure the risk from flooding is not exacerbated and that any ecological harm is minimised'.</p>
Oct – Dec 2022	Non-statutory Consultation	<p>A period of non-statutory consultation was held for between, the 24<sup>th</sup> 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.</p>
30/11/2022	Follow up email	<p>Design update documentation issued to the IDB.</p>

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
24/01/2023	Initial consultation meeting	Initial consultation meeting between the proposed project's engineering teams and consenting teams with the River Stour IDB.
14/11/2023	Follow up consultation meeting	Follow up consultation meeting between the proposed project's engineering teams with the River Stour IDB.
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 were shared.
09/01/2025	Proposals update email chain	Memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0480) issued to the River Stour IDB alongside a design update document 'SEAL-MMD-SEAL-ENG-TCN-0753' for review.  Receipt of information was received on the 12/02/2025. Additionally, the River Stour IDB asked if there were any actions with them.
21/02/2025	Proposed project update email chain	Response from the proposed project's engineering team confirming there are no specific actions agreed with the River Stour IDB and noted that the majority of issues are agreed at this stage. However, the River Stour IDB are to contact the proposed project's engineering team if they have any questions regarding the proposals set out in the design interface update (SEAL-MMD-SEAL-ENG-TCN-0753) and memorandum of Understanding (SEAL-MMD-SEAL-ENG-REP-0480) were re-shared.
03/09/2025	SoCG discussion	Online meeting with <a href="#">River Stour IDB Joe Williamson</a> and representative of the National Grid design team. Actions for <a href="#">NGMG</a> to update the wording in the SoCG and to provide the drainage strategy documents to offer clarity on discharge rates and impermeable areas.

## 3. Areas of Discussion Between the Parties

### 3.1 Design criteria

Table 3.1 Design criteria

Ref	Relevant Application Document	Summary of Description of Matter	River Stour IDB Current Position	The Applicant Current Position	Status
3.1.1	N/A	Buffer zones	Buffer zone of 20 m on each side of watercourse for trenchless crossing is acceptable to the IDB.	Agree with IDB position.	Agreed
3.1.2	N/A	Buffer Zones	River Stour IDB does not regulate Buffer strips around/along non-IDB maintained watercourses.	Buffer strips not required but a buffer of 5 m from top of the bank of the watercourse should be established. No material stockpiling within buffer zone.	Agreed
3.1.3	N/A	Design Criteria for proposed permanent works.	1-100 years + 45% Climate Change Agreed.	Agree with IDB position.	Agreed
3.1.4	N/A	Reinstatement	Reinstatement of riverbank as per the owner's requirements and with IDB consent.	Reinstatement to be like for like, with original levels reestablished in agreement with IDB. Correspondence with land/riparian owners required.	Agreed

## 3.2 Consents and regulation

**Table 3.2 Consents and regulation**

Ref	Relevant Application Document	Summary of Description of Matter	River Stour IDB Current Position	The Applicant Current Position	Status
3.2.1	N/A	Watercourse ownership	<p>All watercourses excluding main rivers are owned by their respective riparian owner and will require their consent for any works. These watercourses are also under the control of the IDB and any works affecting them will require IDB consent in accordance with the Land Drainage Act 1991 and the Board's own Byelaws.</p> <p>Requirements of consenting will be dependent on watercourse basis and potential risks and impacts.</p>	Landowners to be engaged.	Agreed
3.2.2	N/A	Watercourse cross section	Any works within 8 m of the top of bank of any IDB maintained watercourse requires	Agree with IDB position.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	River Stour IDB Current Position	The Applicant Current Position	Status
			prior written consent of the IDB.		
3.2.3	N/A	Discharge criteria	<p>Temporary design criteria: 1 in 30 year storm event without 20% climate change allowance acceptable.</p> <p>Permanent design criteria: 1 in 100 year storm event plus 45% climate change allowance.</p> <p>Maximum discharge rates: 2 l//sha as maximum discharge rate into any watercourse. Total discharge rates will be calculated using the size of catchment upstream of the flow control device. This will be refined at later stage of the proposed project using QBAR calculations. Possibly to use 5 l/s discharge if the catchment area is large enough. The RSIDB will not accept any increase in rate of discharge.</p>	Agree with IDB position on all aspects except “ <i>The RSIDB will not accept any increase in rate of discharge</i> ” where discussions are ongoing.	<del>Under Discussion</del> Not Agreed

### 3.3 The ~~Proposed Project~~ proposed project and watercourses managed by the River Stour IDB

**Table 3.3 The proposed project and watercourses managed by the River Stour IDB**

Ref	Relevant Application Document	Summary of Description of Matter	River Stour IDB Current Position	The Applicant Current Position	Status
3.3.1	N/A	Asset interfaces	IDB to review design interface document issued on 09/01/2025.	Where a new access (haul road) crosses a watercourse a temporary or permanent box culvert or flume will be installed. The culvert is to maintain the clearway of the watercourse with sizing to be agreed with IDB once flow modelling is completed. Mammal ledges are to be included on both banks and the invert of culvert is to be installed below the bed of the watercourse.	<u>Under Discussion</u> <u>Not Agreed</u>
3.3.2	N/A	Haul Roads	Temporary culvert: large as possible to avoid reduction in capacity. Minimum area 600 x 900 mm. No flow design required, if the capacity of the watercourse is not affected by the culvert. Culvert can sit on the riverbed to minimise impact of the culvert in the	Culvert design shared with IDB for comment on 9 January 2025.	<u>Under Discussion</u> <u>Not Agreed</u>

Ref	Relevant Application Document	Summary of Description of Matter	River Stour IDB Current Position	The Applicant Current Position	Status
			<p>watercourse, culvert flush with the bed level. For large temporary culvert excavation can be allowed to remove silt and sit lower at riverbed.</p> <p>Permanent culvert: Minimum area 600 x 900 mm. Flow design required.</p>		
3.3.3	N/A	Cable crossings	All crossings will require warning tape/stakes/markers and protective covers and be a minimum depth of 1 m from cable to hard bed.	Agreed- Crossing design shared with IDB for comment on 9 January 2025.	Agreed
3.3.4	N/A	Trenchless crossings	Minimum depth from cable to hard bed of watercourse to be 2 m.	Agreed – depth to be monitored throughout drilling.	Agreed

## 4. Approvals

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**Signed**



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**On Behalf of**

NGET

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**Name**

James Buckley

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**Position**

Senior Project Manager

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**Date**

29/04/2026

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**Signed**

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**On Behalf of**

River Stour Internal Drainage Board

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**Name**

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**Position**

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**Date**

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## 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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