



Maritime &
Coastguard
Agency

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Our Ref: [REDACTED]

18th November 2025

Via email: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Sir/Madam

Application by National Grid Electricity Transmission (NGET) for an order granting development consent for the South East Anglia Link (Sea Link) Project

Examination Authority Written Representation - deadline 1 (18th November 2025)

The Maritime and Coastguard Agency (MCA) is an Executive Agency of the Department for Transport (DfT) and is responsible throughout the UK for implementing and developing the UK Government's maritime safety and environmental protection policy. This includes co-ordinating maritime Search and Rescue (SAR) through His Majesty's Coastguard 24 hours a day.

The MCA is also the National Competent Authority for Vessel Traffic Services (VTS) appointed by DfT under SOLAS Chapter V - Regulation 12. VTS Centres are either operated by Ports or lay outside of the legal authority of a port and thus must be operated by a Coastal State. The MCA operates two 'Coastal' VTS Centres, the SUNK and Channel VTS. His Majesty's Coastguard (HMCG) have responsibility for the day-to-day operation of Sunk and Channel.

The SUNK area is very busy with converging marine traffic with many vessels, including some of the largest in the world, heading in or out of some of the busiest ports in the UK. The SUNK region is highly constrained with dense maritime traffic, challenging environmental conditions, specialist pilot boarding arrangements, and the presence of deep-draught vessels potentially up to 20m draught in the future. The risks of collision or running aground here could have catastrophic consequences.

The MCA would like to ensure that our position is progressed through the Statement of Common Ground and ensure that the required risk mitigation measures are secured appropriately through conditions of the Development Consent Order Deemed Marine Licence.

The Statement of Common Ground (SoCG), Navigation Risk Assessment (NRA), the Shipping and Navigation chapter of the Environmental Impact Report and the draft Development Consent Order (DCO) have been reviewed, and we would like to comment as follows:

Statement of Common Ground (SoCG)

- 1) The SoCG has not been discussed between the UK Technical Services Navigation team at MCA and the applicant despite MCA reaching out on multiple occasions requesting further discussion. Our requests were sent to National Grid in March, June, and in July 2025.

Shipping and Navigation Mitigation Measures

The MCA would request the following to be implemented by the project:

- 1) Construction and installation activities for Sea Link should not coincide with those of the Five Estuaries and North Falls Offshore Windfarm projects (and other future projects) to avoid cumulative impacts and navigational risks.
- 2) No activities involving vessels Restricted in Ability to Manoeuvre (RAM) should run concurrently with activities involving RAM vessels planned by the Five Estuaries and North Falls project developers in the SUNK area (or other future projects). This is mainly near the SUNK Pilot Boarding Ground (PBG).
- 3) No project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility is below nautical 2 miles.
- 4) The cable (and any covering material e.g. rock armour) must be at least 22 metres below Chart Datum in the vicinity of the Deep-Water (DW) Route and DW Anchorage to allow future vessels with a draught of 20 metres. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met and secured in the DCO.

The MCA will respond to the two supplementary questions at deadline 1A - 26th November. This will address the request for “*information on the existing depth below chart datum in those key areas, and how they may be affected by cable crossings and any other protections in terms of reducing under keel clearance*”. This was requested by the ExA at the ISH1 on 11th November 2025.

Development Consent Order

It is the MCA's view that the controls are not currently adequate in the draft DCO to address the reduction of navigation depth and Under Keel Clearance (UKC).

- 1) The draft DCO (AS-088) references the reduction in navigable depth by more than 5% within Schedule 16 Part 2 (12.3). We would like to highlight that as per MCA Relevant Representation (RR-5382) submitted on 23 June 2025, *any depth reduction in areas where deep-draught vessels operate must be reviewed. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA and secured through consent conditions.*

This condition also only deals with maintenance, and for installation we would like a bespoke condition to ensure the 22m below chart datum is secured. Therefore, we would like to amend the condition in Schedule 16 Part 2, 12 (3) and add a new condition which is to be discussed and agreed between the applicant, the ports and the MCA. This requirement is particularly critical near North Shipwash,

the SUNK area (including W1, precautionary areas, SUNK Deep Water Anchorage, and the Long Sand Heads two-way route), west of Thanet OWF, and approaches to Pegwell Bay.

- 2) The cable (and any covering material e.g. rock armour) must be at least 22 metres below Chart Datum in the vicinity of the Deep-Water (DW) Route and DW Anchorage to allow future vessels with a draught of 20 metres. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met and secured in the DCO.
- 3) To maintain adequate burial depth in this area, the project must implement timely remedial measures if cable exposure occurs due to seabed mobility and promptly notify all relevant operators of the exposure. We would like to amend the DML condition under Schedule 16 Part 2 (3.12)) to:

*“In case of exposure of cables on or above the seabed, the undertaker must, within five days following identification of a cable exposure, **and within SUNK Area and especially near the SUNK DW Anchorage as soon as reasonably practicable** notify mariners and port authorities in the SUNK region by issuing a notice to mariners and by informing Kingfisher Information Service of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, Kingfisher Information Service of Seafish and UK Hydrographic Office within seven days of the exposure identification”.*

We have identified that there are large container ships (up to 400m LOA) anchoring to the edge of the SUNK DW anchorage to ensure they can be closer to the Pilot Boarding Ground. On certain occasions, they are around 300m North of the proposed cable route. If these large container vessels are to drag anchor (in an adverse weather scenario) onto an exposed cable, there will be damage to the cable and potentially a vessel incident within an already complex area. If such a notice is issued, the vessels can stay clear of the area, and authorities can track any vessels approaching to anchor close to the cable.

The MCA would like to confirm that we wish to be consulted for the relevant shipping and navigation related conditions within the DCO. Confirmation was requested by the ExA at the ISH1 on 11th November 2025.

Cable Routes / Cable Protection and Cable Burial Risk Assessment

The draft Cable Burial Risk Assessment (CBRA) (PDA-039) states within Table 24 that from KP 35.089 (North of Storm Buoy) to KP 56.887 (SUNK Outer Precautionary Area, NW of Sunk S2 Buoy) the Depth of Lowering will be at least 2.0m, and further within the CBRA it is stated that

“The maximum recommended depth of lowering has been calculated as 2.5 m within the areas of highest risk in the vicinity of the SUNK deepwater anchorage and the shipping channels associated with the SUNK Vessel Traffic System (VTS) and the southeastern approaches to the Outer Thames Estuary adjacent to the North Foreland”.

As per above, we would like the project to bury the cable to 22m below chart datum in the vicinity of the DW route and SUNK DW Anchorage to be in line with the burial depths agreed within the Navigation Installation Plan of other projects in the area to ensure any future dredging can be undertaken to accommodate vessels up to 20m draught can safely navigate in this area in future. We believe that a bespoke condition to ensure compliance with this requirement should be secured within the DCO-DML.

Where burial depths as informed by the Cable Burial Risk Assessment (CBRA) cannot be achieved in the maintained depth channels, any potential reduction in surrounding depths referenced to Chart Datum will need special attention and further consultation with the MCA, Ports in the area and other relevant stakeholders. Any consented cable protection works must ensure existing and future safe navigation is not compromised.

Electromagnetic Deviation

The MCA confirms that the offshore section complies with our requirements; less than 3° deviation for 95% of the route and less than 5° for the remaining 5%, as detailed in Table 5.2 of the Electric and Magnetic Field Compliance report. In nearshore areas where the cables are separated by 45m and buried to a depth of 10m (approximately 2.435 km in total—1.524 km along the Suffolk coast and 0.911 km in Pegwell Bay), no detailed EMF assessment has been provided. While this segment represents only 2% of the total route and vessel traffic is mostly perpendicular (minimising interaction), the separation may result in compass deviations exceeding 5°.

Although the navigational impact is expected to be minimal, the MCA requests that the project team ensure maximum burial depth throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential EMF effects on vessel navigation. Should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, MCA should be consulted, and a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.

Navigation Installation Plan (NIP) document 9.12

In response to MCA and stakeholder concerns at the Hazard Identification workshop, PEIR and subsequent additional meetings, a Navigation Installation Plan (NIP) has been proposed by the applicant. This plan seeks to mitigate further any potential increases in the risk of collision in association with project vessels involved in cable laying works, especially in the Sunk Precautionary and Pilot boarding areas during simultaneous operations.

Full consultation on the NIP is essential. Given the complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital. The NIP must be discussed and agreed with the PLA, Harwich Haven Authority (HHA), Medway Port, London Gateway Port and the MCA and must address the SIMOPS within the SUNK region, specially near the DW routes and PBG.

A key concern is possible multiple projects in the SUNK area at the same time with vessels in RAM status. This leaves very little room for the Ultra Large Vessels that enter daily into London and Harwich, restricted to one of three narrow channels. This is made worse in periods of good weather with sailing vessels criss-crossing, often not responding to SUNK VTS on VHF (out of range) and if they do, with poor English and/or lack of any idea of the risks around them and understanding of the COLREGs.

Specific comments:

1. Although not in the Channel TSS, the Southern AOI is partly and Kent Landfall AOI fully within the Channel VTS monitoring area. Therefore, Channel VTS needs to be added under Interested Parties.
2. Under Section 3.2, Key Project Protocols, add reference to compliance with the SUNK Rules as applicable as documented in the ALRS, Page 447 (NP286(1), Vol 6, 6th Edition, 2025).
3. The document references an Emergency Plan and Contingency Plan – further discussion required here, as soon as developed in first draft.

In previous surveys / similar operations, the below has greatly assisted which we would like to see considered in the NIP:

- Daily morning call with all stakeholders (10mins) to outline the day's activities and 24 hrs look-ahead (This was useful as plans were made/ adjusted around the pilotage operations)
- The vessels maintain a strict watch on Ch14/16 and in regular comms with SUNK VTS
- The vessels involved only show RAM when in fact Restricted in their Ability to Manoeuvre.
- Where possible, the vessels clear the pilot boarding area at least 30mins (ideally 1 hr) before pilot operations

- An understanding of time in position/ speed of work
- Minimum requested Closest Point of Approaches (CPA)
- An understanding of who has priority in 'concurrent RAM activities'
- Role and responsibilities of any Guard Vessels- where assessed as necessary and in compliance with the COLREGs, including the requirement that any Guard Vessels do not drift or loiter in the vicinity of any Deep-Water Routes within the SUNK area, when not engaged on active tasking.

Navigation Risk Assessment process

The Applicant has undertaken a detailed Navigation Risk Assessment (NRA) in accordance with the International Maritime Organization (IMO) risk assessment methodology. We have no concerns to raise with regards to the assessment methodology. However, we would like to recommend additional risk mitigation measures to ensure the risk to shipping and safe navigation is As Low As Reasonably Practicable (ALARP). Once further details have been provided by the applicant, as requested by the ExA at the ISH1 on 11th November, and we have reviewed them, the MCA will then confirm whether the risk mitigation measures are relevant and appropriate, and will serve to reduce identified risks to ALARP.

We hope this information is useful to the Examination Authority at this stage.

Yours faithfully,

[Redacted Signature]

[Redacted Name]

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