The Great Grid Upgrade

Sea Link

# Sea Link

**Volume 7: Other Documents**

**Document 7.4.10: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Maritime and Coastguard Agency.**

**Planning Inspectorate Reference: EN020026**

**Version: B**
**November 2025**

**Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)**

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| **Date** | **Version** | **Status** | **Description / Changes** |
| March 2025 | A | DRAFT | Issued with DCO application |
| November 2025 | B | DRAFT | Issued to PINS for Deadline 1 |

# 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 Maritime and Coastguard Agency (MCA). 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 An early draft SoCG was prepared by the Applicant to submit with the DCO application, based on engagement with MCA throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with MCA to resolve issues as the project progresses through the Pre-Examination and Examination phases.

1.2.3 This draft SoCG was shared with the MCA shortly before Deadline 1. Due to the limited time before the deadline, no comments have yet been received on this version. Any new matters added since then are marked as "under discussion." The Applicant will continue collaborating with the MCA to resolve issues during the Examination phase and will update future versions of the SoCG to reflect any agreements reached.

1.2.4 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and MCA 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.

1.2.5 For the purpose of this SoCG, the Applicant and the MCA will jointly be referred to as the 'Parties'. When referencing the MCA alone, they will be referred to as 'the Consultee'.

## 1.3 Role of the Maritime and Coastguard Agency in the DCO Process

1.3.1 The Consultee is an executive agency of the Department for Transport (DfT), providing a 24-hour maritime and coastal search and rescue emergency coordination and response service for the United Kingdom.

1.3.2 The Consultee produces legislation and guidance and provides certification to ships and seafarers, as well as policy advice for the DfT for Ministers.

1.3.3 The Consultee is responsible for implementing British and international maritime law and safety policy and is governed by the DfT and the Secretary of State for Transport.

## 1.4 Description of the Proposed Project

1.4.1 The Proposed Project is a proposal by the Applicant to reinforce the transmission network in the South East 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 The Applicant owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, the Applicant 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 400kV overhead line close to Richborough in Kent.

1.4.4 The Applicant 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:

- 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
- 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*."

1.4.5 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.

1.4.6 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.

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 |
| DfT | Department for Transport |
| EIA | Environmental Impact Assessment |
| EMF | Electromagnetic Field |
| ES | Environmental Statement |
| ESO | Energy System Operator |
| HVAC | High Voltage Alternating Current |
| HVDC | High Voltage Direct Current |
| MCA | Maritime and Coastguard Agency |
| MCZ | Marine Conservation Zone |
| NIP | Navigation Installation Plan |
| NRA | Navigational Risk Assessment |
| PLA | Port of London Authority |
| PRoW | Public Right of Way |
| SAC | Special Area of Conservation |
| SoCG | Statement of Common Ground |
| TJB | Transmission Joint Bay |
| TSS | Traffic Separation Scheme |
| UKMA | UK Masters Association |
| VTS | Vessel Traffic Services |

# 2. Record of Engagement

## 2.1 Summary of pre-application discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the DCO application.

### Table 2.1 Pre-application discussions

| Date | Topic | Discussion points |
|---|---|---|
| *28 April 2021* | *The Applicant, MCA, Aecom, Arup – Project Introduction and Routeing Briefing meeting* | *Project introduction and background, the Applicant approach to developing proposals, Sea link Project – overview, indicative programme, progress to date, study areas, indicative marine route and marine survey scope, next steps; questions/AOB. Actions: The Applicant to MCA advance notice of consenting route, The Applicant to contact MCA to understand potential vessel management concerns for Sea Link.* |
| *11 May 2021* | *The Applicant, MCA, Arup, AECOM - Routeing; Shipping and navigation Meeting* | *Project background and need case – the Applicant responsibilities under the Electricity Act, network capability identified by National Grid Energy System Operator (ESO); approach to developing proposals – the Applicant to give advance notice of consenting strategy to MCA; Sea Link – overview of progress, marine route options, study area: AOB/questions* |
| *07 June 2021* | *The Applicant, MCA, Port of London Authority (PLA), Aecom, 4C Offshore Ltd – Routeing briefing meeting – Alternative routeing through the Sunk* | *Introductions and objectives, route update – using feedback from stakeholders, route moved outside Margate and Long Sands Special Area of Conservation (SAC), questions and AOB. Actions: The Applicant to consult MCA and PLA on Vessel Management Plan, the Applicant to confirm final marine route.* |

| Date | Topic | Discussion points |
|---|---|---|
| *04 July 2022* | *The Applicant, MCA, Port of Felixstowe, Port of London Authority - Additional marine survey* | *Additional marine surveys (Teams meeting). Concerns over Goodwin Sands Marine Conservation Zone (MCZ) and GridLink Crossing, Nemo Link crossing, proposed marine route refinements to the East of Shipwash.* |
| *12 July 2022* | *The Applicant, MCA, Trinity House, Harwich Haven Authority - Additional marine surveys; routeing* | *Routeing and Additional marine surveys (Teams meeting). Marine route corridor through the Sunk Traffic Separation Scheme (TSS), East of Shipwash, GridLink crossing, route adjacent to Goodwin Sands.* |
| *24 April 2023* | *Shipping and navigation consultation meeting and Hazard workshop* | *Shipping and navigation consultation, project update, scoping comments, data sources, assessment methodology Presented initial results from Navigational Risk Assessment and conducted Hazard workshop to identify potential shipping and navigation impacts, in a remote meeting.* |

## 2.2 Summary of post-application discussions

2.2.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties after the submission of the DCO application.

### Table 2.2 Post-DCO application discussions

| Date | Topic | Discussion points |
|---|---|---|
| *23 June 2025* | *Submission of Relevant Representations* | *Relevant Representations covered the following topics: routeing consultation, consultation regarding Tongue Pilot Station proximity, the Navigation Installation Plan, cumulative impacts, navigable depth and protective measures, future vessel draught considerations,* |

| Date | Topic | Discussion points |
|---|---|---|
| | | *electromagnetic fields and shipping and navigation.* |

# 3. Areas of Discussion Between the Parties

## 3.1 Assessment Methodologies

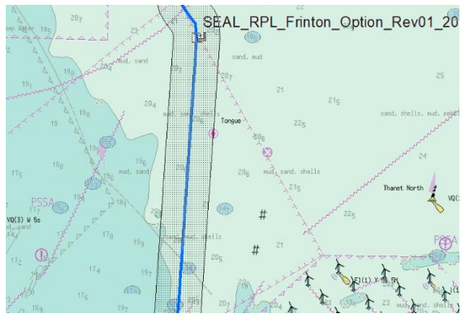
### Table 3.1 Assessment Methodologies

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| 3.1.1 | **Application Document 6.14 Environmental Scoping Report 2022 [APP-299]**<br>**Application Document 6.15 Scoping Opinion 2022 [APP-300]** | Environmental Impact Assessment (EIA) Scoping Report | The Consultee confirms EIA Scoping Report is adequate. | The scope of the EIA that is set out in the Applicant's scoping report (see **Application Document 6.14 Environmental Scoping Report 2022 [APP-299]**), taking account of the Consultee's comments made in its response to the request for a scoping opinion (see **Application Document 6.15 Scoping Opinion 2022 [APP-300]**), is adequate. | Agreed |

## 3.2 Shipping and Navigation

### Table 3.2 Shipping and Navigation

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| 3.2.1 | | Sunk Vessel Traffic Services (VTS) | The Consultee confirmed the MCA is responsible for Sunk VTS and any matters regarding the Sunk VTS should be discussed with the Consultee. | The Applicant has noted this clarification from the Consultee. | Agreed |
| 3.2.2 | **Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** | Reduction in water depth | The Consultee confirmed there would be a concern if there would be reduction in water depth particularly in relation to PLA port and crossing in deep water channel.<br><br>The Consultee noted that 5% change in water depth is a trigger point for discussion on impact with National Grid.<br><br>The Consultee also noted that 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 is especially critical near North Shipwash, the SUNK area (including W1, precautionary areas, and the Long Sand Heads two-way route), west of Thanet OWF, and approaches to Pegwell Bay. 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. | Water depth reduction is discussed in the Navigational Risk Assessment (**Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**).<br><br>The Applicant agrees that a 5% change in water depth would require further discussions with the Consultee if this were to occur.<br><br>The Applicant notes the Consultee's concerns regarding navigable depth and protective measures, and the particular areas of concern listed which include near North Shipwash, the SUNK area, west of Thanet OWF, and approaches to Pegwell Bay.<br><br>The Applicant has been working with stakeholders including PLA and HHA, to understand the areas where they wish to safeguard water depth, and will continue to do so through Examination with the goal of providing clarity, reaching agreement on this matter, and minimising potential impacts. | Under discussion |
| 3.2.3 | | Coastal VTS | The Consultee confirmed the Coastal VTS is run by Dover Coastguard and to speak to MCA regarding this as they are involved in discussions with other developers. | The Applicant has initiated contact with Dover representatives regarding the Coastal Vessel Traffic Services (VTS). | Agreed |
| 3.2.4 | | Communication plans | The Consultee confirmed no issues with vessel management, but to communicate with the MCA.<br><br>The MCA stresses the importance of proactive and transparent communication with ports, harbours, and Estuary Services. Installation vessels must clearly communicate their intentions and activities to ensure safe operations in this critical area. The proposed route intersects one of the UK's key routing measures. The project team must take all necessary steps to minimise navigational risks and ensure that all activities in the SUNK region are promptly communicated to SUNK VTS and relevant port authorities.<br><br>Any survey works conducted within the SUNK area must also be coordinated with the relevant port authorities and the MCA. | The Applicant is preparing a Navigation Installation Plan (NIP) to provide necessary communications with key stakeholders including the Consultee, the Sunk VTS and relevant port authorities and provide vessel management details. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**.<br><br>The Applicant agrees on the importance of proactive and transparent communication with ports, harbours, and Estuary Services.<br><br>The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| 3.2.5 | **Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** | Pilot boarding areas (Sunk and Tongue) | PLA pilot boarding area - Management measures would need to put in place to manage the impacts during cable installation in this area.<br><br>The Consultee confirmed the planned Sea Link cable route passes near to Sunk pilot station and would need a good vessel management plan for construction. For surveys it wouldn't be too much of an issue from initial review of the proposed route presented.<br><br>The Consultee also noted an initial navigational concern in the areas north into the Shipwash but understood this is away from pilots.<br><br>The Consultee advised National Grid to be aware of the location of Tongue pilot boarding station. Management measures would need to put in place to manage any impacts during cable installation in this area. The Consultee noted the more sea room to the east of the Tongue pilot station and confirmed that with a traffic management plan in place it shouldn't have detrimental impact on pilot boarding. MCA are comfortable with route around Tongue (as per image below).<br><br>  <br><br>The Consultee notes that the proposed cable corridor proximity to the Tongue Pilot Station necessitates consultation with Estuary Services and the Port of London Authority (PLA), who are likely to be most affected by any potential restrictions. | The proximity of the planned route to pilot boarding areas is acknowledged. A Navigation Installation Plan (NIP) is being produced post-DCO application submission to provide clear communication throughout cable construction activities. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.<br><br>The Applicant confirmed the proposed Sea Link marine route passes reasonably close to the Tongue pilot boarding station. Again, it was agreed that good communication using a vessel management plan around Tongue will help to mitigate impacts.<br><br>Any potential risk of disruption to pilot boarding areas is considered in **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**.<br><br>The Applicant agreed that it was an important design criterion to avoid pilot areas and locate away from anchorage areas.<br><br>The Applicant agreed that a vessel management plan is a good idea to manage construction risks. This will take the form of an NIP.<br><br>The Applicant has undertaken consultation with the PLA and will continue to do so throughout the pre-Examination and Examination phases. The Applicant interprets that 'Estuary Services' in this context refers to 'Estuary Services Ltd', which the Applicant understands is a subsidiary company owned by PLA, and thus will have had input into PLA consultation. | Agreed |
| 3.2.6 | **Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** | Notifications to local ports and users | The Consultee advised National Grid to make sure the right notifications to local ports and users are issued and if there are unmanned vehicles, load lining exemptions will be needed to confirm communications between vessels. | In mitigation of such risks the Applicant intends to issue Notice to Mariners, and navigation warnings will be sent to a distribution list which will include Port and Harbour Authorities. This is noted in **Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**<br><br>The Applicant confirmed there are currently no plans to use unmanned vehicles at this stage. | Agreed |

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| 3.2.7 | | Overall route through the Sunk TSS | The Consultee noted that any cable through the Sunk TSS will not be free of navigation from vessels, but agrees it seems like a good option given the various constraints.<br><br>The MCA acknowledges and appreciates the applicant's efforts to revise the originally proposed cable route in response to consultation feedback. Given the complexity of SUNK area, there is no perfect routing solution. The revised route now passes north of the W1 buoy and south of the SUNK Deep-Water Anchorage, increasing and decreasing proximity respectively. This highlights the critical importance of coordination and communication among all stakeholders. | The Applicant noted that the route through the Sunk TSS appears a good approach given the various constraints.<br><br>There is a compromise between locating as north as possible of the shipping channel and close to 90 degrees as possible.<br><br>The Applicant welcomes acknowledgement of coordination and communication already undertaken among stakeholders. | Agreed |
| 3.2.8 | | Communications during construction phase | (11 May 2021) The Consultee requested a notice to mariners to define what areas the marine survey vessels will be working in and on what days so the MCA can work with PLA and Harwich to manage other vessel traffic. The MCA are just about to do the same with another project.<br><br>The Consultee was asked if it had a preference for how to deal with notice and communication to mariners. The Consultee confirmed updates on a daily basis to help MCA plan movement would be helpful. On other projects they have received written statements and taken part in daily update calls. | The Applicant acknowledged the importance of maintaining effective communication with relevant stakeholders throughout the construction phase of the Sea Link Project. In response to requests for clear and timely updates during this period, the Applicant has incorporated communication protocols into its construction planning.<br><br>To support this commitment, a Navigation Installation Plan (NIP) is being developed following the submission of the Development Consent Order (DCO) application. The NIP will serve as a key mechanism for disseminating information to mariners and other stakeholders regarding navigational considerations during construction.<br><br>A draft Outline NIP was submitted to the Planning Inspectorate (PINS) on 1 September 2025, as part of the Applicant's response to the Examining Authority's Section 89(3) letter dated 5 August 2025. | Under discussion |
| 3.2.9 | | Sunk deep water anchorage | The Consultee noted proximity to sunk deep water anchorage – there is potential that if a vessel dragged an anchor, they may damage the Sea Link cable. | The Applicant has considered this risk and will mitigate this risk as far as possible, through development of the Cable Burial Risk Assessment post submission. An initial draft has been submitted to PINS in October 2025. | Under discussion |
| 3.2.10 | | Future project engagement | Future project engagement at pre-application stage and on-going throughout the progress of the Proposed Project suggestions:<br><br>The Consultee suggested that National Grid engage with the UK Harbour Masters Association (UKMA) SE coast committee.<br><br>The Consultee suggested that National Grid engage with the Sunk VTS users' group (meet every 6 months). | The Applicant is considering the feasibility of updating stakeholders within these groups. The Applicant attended a Sunk User Group meeting to provide project update on 14th January 2025.<br><br>The Applicant notes the importance of communication and commits to producing a Navigation Installation Plan (NIP) post-DCO submission, which will provide this mechanism for ensuring communication and collaboration with shipping and navigation stakeholders. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| 3.2.11 | **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** | Cable depth and other projects | The Consultee confirmed through conversations with other projects and the PLA, they understand there may be plans to dredge (14-16 m), therefore any cable would have to be buried deeper. Other two projects have also got cable route through the inner precautionary area, which could result in a change in cable depth or possible rerouting of cable. Therefore, with robust vessel management plans in place it is possible to undertake cable activities in this area (precautionary area). The Consultee confirmed this would help make sure the route is clear for inbound and outbound details. | The Applicant noted that robust vessel management plans, as described in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** would be needed during cable installation activities. The Applicant is producing a Navigation Installation Plan (NIP) to provide this management and communication plan. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. | Under discussion |
| 3.2.12 | | Navigation Installation Plan (NIP) | Full consultation on the Navigation Installation Plan (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, and the MCA. | The Applicant has submitted a draft Outline NIP to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. The Applicant will continue to engage with the key shipping and navigation stakeholders, including the Consultee, PLA, HHA and others to update and refine the Outline NIP through the pre-Examination and Examination phases.<br><br>The Applicant wishes to keep the list of Interested Parties as streamlined as possible while including the key relevant stakeholders. The Applicant wishes to be able to update the NIP swiftly, as required, in order to get information out in a timely manner up to and throughout the construction phase. It therefore seeks to limit the list of Interested Parties to only those which overlap with our Areas of Interest, including other offshore developments which may be in construction at a similar timeline through the Sunk region, and those parties identified through consultation as expressing a need for enhanced communication through the consultation phase. Medway Port does not overlap with our NIP Areas of Interest, therefore has not been added as an Interested Party.National Grid most recently engaged with Medway in October 2025 who confirmed and agreed with this approach. | Under discussion |
| 3.2.13 | **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]** | Cumulative Impacts / Simultaneous Operations | Construction and installation activities for Sea Link should not coincide with those of the Five Estuaries and North Falls Offshore Windfarm projects to avoid cumulative impacts and navigational risks. The applicant must work with the relevant ports, VTS and offshore developers to coordinate activity and address this issue. Any simultaneous activities (including survey ops) with vessels on Restricted in Ability to Manoeuvre (RAM) status near the SUNK Pilot Boarding Ground (PBG), particularly to the east of the PBG should be avoided. | The Applicant notes the Consultee''s concerns regarding simultaneous operations. This matter is subject to further discussion and engagement between the Applicant and key shipping and navigation stakeholders which is ongoing, to reassure and find agreement on simultaneous operations.<br><br>Additionally, the Applicant is producing a communication protocol in the form of an NIP to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key Project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The NIP also establishes the "Concurrent Activity Area" within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments. The Applicant has submitted a draft Outline NIP to PINS on 1st September | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| | | | | 2025, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. | |
| 3.2.14 | | Future Vessel Draught Considerations | With vessels potentially reaching draughts of up to 20 m, Harwich Haven Authority (HHA) recommends that the cable and any protective materials (e.g., rock armour) to be a minimum of 22 m below Chart Datum. The MCA fully supports this recommendation to future-proof navigational safety. | Concerns surrounding under-keel clearance are noted and addressed in the Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203], in Section 7.6.<br><br>In line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5 % along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a very small number of locations, which are anticipated to be located close into shore. Any anticipated areas where reductions in water depth may be greater than 5 % will be discussed with relevant stakeholders including port and harbour authorities.<br><br>The request for preserving a minimum water depth of 22 m below chart datum has been discussed with Harwich Haven Authority, and it has been established that this request applies specifically to "the Sunk Area" as defined as the area bounded by the following: North of the Storm Buoy, and NW of the Whiskey 1 Buoy, and East of the Shipwash.<br><br>The Applicant is working with Harwich Haven Authority (HHA) and other key shipping and navigation stakeholders to reassure and find agreement on water depth concerns. This matter is subject to further discussion and engagement between the Applicant and HHA, including specifics on the geographical extent of "the Sunk Area" defined by HHA. The Applicant is arranging a further meeting with HHA in order to discuss this and find agreement. | Under discussion |
| 3.2.15 | **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]**<br><br>**Application Document 6.2.1.4 Description of the Proposed Project [AS-093]** | Electromagnetic deviation | The MCA has reviewed the Electric and Magnetic Field Compliance Report for the Sea Link HVDC cable. We confirm 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 report.<br><br>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 electromagnetic field (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°.<br><br>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 effects on vessel navigation. Should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met | The Applicant notes the Consultee's request that the maximum burial depth be used throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation.<br><br>The Applicant notes the Consultee's request that should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.<br><br>The Applicant confirms an initial high-level assessment has been undertaken in response to this comment in the MCA Relevant Representation and are confident they can meet the Consultee's requirements in this area. A full update to the EMF report will be carried out once a full analysis update had been carried out pre-construction and will be shared with the Consultee at the earliest opportunity. | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | MCA Current Position | The Applicant's Current Position | Status |
|---|---|---|---|---|---|
| | | | pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required. | | |

# 4. Approvals

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| **Signed** | |

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| **On Behalf of** | National Grid |
| **Name** | |
| **Position** | |
| **Date** | |

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| **Signed** | |

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| **On Behalf of** | Maritime and Coastguard Agency |
| **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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