

# Sea Link

## Volume 7: Other Documents

Document 7.4.11: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Port of London Authority.

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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 the Port of London Authority (PLA) . 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 PLA throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with PLA to resolve issues as the project progresses through the Pre-Examination and Examination phases.
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and PLA 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, the Applicant and the PLA will jointly be referred to as the “Parties”. When referencing the PLA alone, they will be referred to as “the Consultee”.

## 1.3 Role of the Port of London Authority in the DCO Process

- 1.3.1 The Consultee is a trust port, which is a port that is an independent statutory body, controlled by a local independent board, responsible for the tidal area of the river Thames. The Consultee is the Statutory Harbour Authority for the tidal area of the river Thames. The Consultee’s operations cover 95 miles from Teddington to the North Sea.



- 1.3.2 The Consultees statutory functions include responsibility for conservancy, including dredging and improvement of the river Thames; managing public navigation and ensuring navigational safety and controlling vessel movements. Its consent is required for the construction or carrying out of all works in the river Thames. The Consultees functions include the promotion of the use of the river Thames for freight and passengers as an important and sustainable transport corridor.
- 1.3.3 The Consultee operates under the legal framework set out under the Port of London Act 1968 (as amended) to ensure that all users of the tidal part of the river Thames are safe, secure and sustainable.

## 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 (2m allowance for ground level rise plus 26 m converter station) 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                      |
|-------------------|---------------------------------|
| CD                | Chart Datum                     |
| DCO               | Development Consent Order       |
| HRA               | Habitat Regulations Assessments |
| MCA               | Maritime and Coastguard Agency  |
| NIP               | Navigation Installation Plan    |
| NRA               | Navigation Risk Assessment      |
| PRoW              | Public Right of Way             |
| SAC               | Special Areas of Conservation   |
| SoCG              | Statement of Common Ground      |
| TSS               | Traffic Separation Schemes      |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 26 April 2021  | <i>The Applicant, PLA, Arup, Aecom, 4C offshore Ltd - Project introduction meeting</i> | <p><i>Introductions and objectives, project background, approach to developing proposals, Sea Link – project overview, indicative programme, progress to date, study areas, indicative marine routing and marine survey scope, next steps; AOB/questions,</i></p> <p><i>Actions: The Applicant to consult with MCA on Traffic/Vessel Management Plan once prepared, PLA to speak to pilots to double check feedback/concerns, PLA to confirm minimum sea level that is acceptable, the Applicant to meet with SUNK User Group and Trinity House and other relevant marine stakeholder bodies.</i></p> |
| 07 June 2021   | <i>The Applicant, PLA, MCA, Arup, Aecom, 4C Offshore Ltd - Routeing meeting</i>        | <p><i>Introductions and objectives, route update – PLA confirmed new route is better than previous, questions and AOB.</i></p> <p><i>Actions: The Applicant to consult MCA and PLA on Vessel Management Plan and the Applicant to confirm final marine route.</i></p>                                                                                                                                                                                                                                                                                                                                 |
| 04 July 2022   | <i>Surveys</i>                                                                         | <i>Additional marine survey</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 05 August 2022 | <i>The Applicant, Aecom, PLA, Red Penguin – Routeing Meeting</i>                       | <p><i>Project update and status of the Project – Sea Link completed marine survey in October 2021, Sea Link reviewing survey results, Sea Link looking to undertake additional surveys in this area.</i></p> <p><i>Actions: PLA to email Sea Link documents that outline future plans for PLA (including any future dredging plans).</i></p>                                                                                                                                                                                                                                                          |
| 28 April 2023  | <i>Shipping and navigation consultation meeting and Hazard workshop</i>                | <i>Consultation remote meeting with Port and Harbour Authorities to present initial results from Navigational Risk Assessment and Hazard workshop to identify potential shipping and navigation impacts</i>                                                                                                                                                                                                                                                                                                                                                                                           |
| December 2023  | <i>PEIR</i>                                                                            | <i>PLA response to statutory consultation</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



| Date             | Topic                | Discussion points            |
|------------------|----------------------|------------------------------|
| July-August 2024 | Survey               | Notification of Survey       |
| August 2024      | Further consultation | PLA response to consultation |

## 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-application discussions**

| Date            | Topic                                                                                       | Discussion points                                                                                                                                                                                                                                                                  |
|-----------------|---------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| March 2025      | PLA review of SoCG                                                                          | PLA comments on SoCG document                                                                                                                                                                                                                                                      |
| 23 June 2025    | PLA Relevant Representation                                                                 | Water depth and under-keel clearance to ensure current and future port access, cable crossings, cable lay approach, simultaneous operations, dredging.                                                                                                                             |
| 26 June 2025    | Teams meeting on SoCG                                                                       | Discussion points including Navigation and Installation Plan (NIP), under-keel clearance and the three areas of Safeguarded Depth GIS file provided by PLA to the Applicant, cable crossings including GridLink crossing, Sunk region crossings, cable burial and protection.      |
| 01 August 2025  | GIS shapefile data from PLA shared with the Applicant, defining Area's of Safeguarded Depth | GIS shapefile defining PLA's Areas of Safeguarded Depth, comprising three areas: "Sunk pilot boarding station area", Long Sand Head Two-Way Route crossing area" and "NE Spit area", and establishing the required depths as 22m, 12.5m and 12.5m below Chart Datum, respectively. |
| 17 October 2025 | Teams meeting on Protective Provisions                                                      | Discussion points including the PLA's three Areas of Safeguarded Depth, GridLink crossing, Protective Provisions wording.                                                                                                                                                          |

### 3. Areas of Discussion Between the Parties

#### 3.1 Shipping and Navigation

Table 3.1 – Shipping and Navigation

| Ref   | Relevant Application Document                                                     | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The Applicant’s Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Status           |
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| 3.1.1 | Application Document 6.3.4.7.A ES Appendix Navigational Risk Assessment [APP-203] | Water depth                      | <p>The Consultee expressed concerns surrounding any reduction in water depth in the deep water channels and in the long sand head two way route.</p> <p>The proposed marine route is running close to the northeast spit boarding and landing diamond and there must be no reduction in water depths in this area. The area of boarding and landing is not limited to the diamond but takes place depending on weather and other traffic. GridLink runs close to Elbow Buoy, where water depth is also critical. Boarding and landing can also take place in the vicinity of the Elbow Buoy. Container ships can sometimes come through here, using Northeast Spit/Elbow. Where it is shallower, further south, there are less concerns as ships don’t navigate through this area.</p> <p>In terms of dredging, there are plans to increase access depths. The Consultee want to maximise their opportunities for large vessels, but future trade is not completely known, so it is a balance to future proof.</p> <p>Water depth needs to be safeguarded at the deep-water routes. Consensus is that access needs to be safeguarded for vessels of 20m draft, and accounting for 10% under keel clearance that means that -22 m CD needs to be safeguarded. Five Estuaries and North Falls have agreed this is realistic future scenario</p> | <p>Impacts of potential reduction in water depth is discussed in <b>Application Document 6.3.4.7.A ES Appendix Navigational Risk Assessment [APP-203]</b>.</p> <p>The Applicant has provided the latest Order Limits to the Consultee (in July 2022 and again in December 2024) .</p> <p>Regarding Deep Water Routes, the Applicant can confirm that unlike the Five Estuaries and North Falls projects, the Sea Link cable route will not interact with the deep water routes “Sunk deep water route” or “Trinity deep water route”.</p> <p>Regarding a GridLink cable crossing, the Applicant’s current position is that a co-engineered solution would be designed which minimises the height of rock berms/protection structures but maintains required protection levels.</p> <p>The Applicant acknowledges the Consultee’s point about needing to provide clarity and confidence surrounding long term access to the Port of London and seeks to engage further with the Consultee to provide assurance on this matter and provide greater clarity.</p> <p>The Applicant understands the Consultee’s position on facilitating current and future access to and from the port and has received the Consultee’s geographical information system (GIS) data of the three areas of safeguarding water depth (Sunk pilot boarding station area, Long Sand Head Two Way Route crossing area, and NE Spit area).</p> <p>The Applicant has been working with the Consultee to understand areas where the Consultee wishes to safeguard water depth</p> | Under discussion |

| Ref   | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Status           |
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|       |                               |                                  | <p>and are designing their scheme accordingly.</p> <p>The Consultee also requires 12.5 m for the southern access to the port (see also 3.1.7 Routeing below).</p> <p>Concern surrounding placing a constraint on the size of vessel that can enter the Port of London and therefore the capacity of the Port of London. The Sea Link application needs to provide clarity and confidence that long term access/egress to the Port of London would be maintained and that short term impacts during construction and maintenance would be kept to a minimum.</p> <p>The depth of the offshore cables are critical. In order to facilitate current and future access to and from the port the PLA needs to safeguard 22 m below chart datum for its northern approaches and 12.5 m below chart datum for its southern approaches. These water depths must therefore not be compromised in certain locations in order to facilitate access and egress for vessels over the life time of the project into and out of the Port of London. This means that there will be locations for example, at the Northeast Spit and at the Long Sand Head 2-way route where there cannot be a 5% reduction in water depth let alone a greater than 5% reduction in water depth.</p> | <p>to ensure long term access to the Port of London and will continue to do so through Examination with the goal of reaching agreement on this matter and minimising potential impacts.</p> <p>The Applicant is able to commit to safeguarding water depth to 12.5 m below Chart Datum within the PLA's Area of Safeguarded Depth 'Long Sand Head Two-Way Route crossing area', is continuing to engage with the Consultee in order to agree wording and terms of this commitment, and is also continuing engagement to come to an agreement in the remaining two areas.</p> |                  |
| 3.1.2 |                               | Cable crossings                  | <p>The Consultee expressed concerns surrounding cable crossings with other cables projects, including GridLink and Nemo Link. The Consultee's preference is for crossings to be in deeper water.</p> <p>At cable crossings, one cable will need to be buried deeper in order to allow the second cable to be placed</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Potential cable crossings are set out in the Environmental Statement. As above, the Applicant's current position is that a co-engineered solution would be designed which minimises the height of rock berms/protection structures but maintains required protection levels.</p> <p>The Applicant has discussed the matter of the GridLink crossing with the Consultee and is working on the possibility of moving the current planned cable route into deeper</p>                                                                                                        | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Status |
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|     |                               |                                  | <p>on top of the first cable and still maintain water depths. The Consultee has concerns over what happens in the future, not just the design impacts, i.e. despite what was agreed at the time, scour occurs, and rock protection is needed in the future (and depth is reduced).</p> <p>The Consultee is also concerned about cumulative impacts, and the multiple cables that are proposed in this area, sterilising significant areas of riverbed. Crossings involve the placing of rock protection on the riverbed and the more cables that are proposed the more crossings that will inevitably be required. Parties need to work together wherever possible to minimise impacts and to maximise the potential for other projects to come forward in the future.</p> <p>Any cable crossings will not be acceptable at the long sand head two-way route.</p> <p>Any cable crossings should be avoided in the vicinity of the Boarding and Landing Areas to avoid disruption to this crucial service when laying or maintaining the cable.</p> <p>The Consultee requests shapefiles to allow the crossing with GridLink to be interrogated further, but also other projects that are being brought forward at the same time (Five Estuaries, North Falls, Neuconnect etc.).</p> <p>Cable crossings have the potential to impact on water depths and, as set out in the in the paragraph 7.6.20 of <b>Application Document 6.3.4.7.A ES Appendix Navigational Risk Assessment [APP-203]</b>. North Falls, NeuConnect, Gridlink, Britned, Nemo Link and Five Estuaries projects are</p> | <p>waters to the east within the Marine Order Limits in order to provide increased headroom at the expected location of the crossing with GridLink. Engagement with the Consultee and GridLink on this matter is ongoing, in order to come to a suitable agreement. Further meetings are in the process of being arranged.</p> <p>Ongoing discussions are taking place between the Applicant and the Parties regarding commitments to maintaining safeguarded water depths within the three designated Areas of Safeguarded Depth. The Applicant can confirm that, based on the GIS dataset provided by the Consultee, no cable crossings have been identified within the 'Long Sand Head Two-Way Route crossing area'. This confirmation supports continued alignment with PLA safeguarding requirements and ensures that project planning remains consistent with navigational and operational constraints.</p> <p>The Applicant notes the Consultee's request to provide clarity and confidence surrounding cable crossings and potential impacts on water depths and seeks to engage further with the Consultee to provide assurance on this matter and provide greater clarity.</p> <p>The Applicant has provided the latest Order Limits to the Consultee (in July 2022 and again in December 2024), and has engaged throughout 2025 to discuss protective provisions in relation to protection of water depth.</p> |        |

| Ref   | Relevant Application Document | Summary of Description of Matter                        | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Status           |
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|       |                               |                                                         | all expected to intersect the Offshore Scheme including crossings. The PLA must have confidence that where the Proposed Project crosses these schemes or will be crossed by these schemes that the required water depths will be maintained and that the Sea Link offshore cables will be buried at sufficient depth or placed in areas of deeper water so that any cables that cross Sea Link in the future also maintain the required water depths.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                  |
| 3.1.3 |                               | Vessel Management Plans & Vessel Communication Protocol | <p>Any cable laying vessels and ships need to be set apart.</p> <p>A Vessel Management Plan will be crucial once contractors are on board, including for survey and construction.</p> <p>Recommended that dialogue occurs with the contractor through SUNK user group (which includes interested parties e.g. representatives from aggregate dredging and Chamber of Shipping).</p> <p>An Outline Navigation Installation Plan is something we would expect Sea Link to produce and submit in support of this application. This would be consistent with the approach taken for other recent DCO applications.</p> <p>The Consultee needs to know exactly where the cable vessel installation vessel is at all times. On the approach to London arrival and departure arc and the approach to the NE Spit pilot boarding station particularly is a very high traffic route, so this would need to be strictly managed with London VTS. Daily reports to specify which section the project is working in have been requested by the Consultee.</p> | <p>The Applicant notes the importance of communication and commits to producing a Navigation Installation Plan (NIP), 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.</p> <p>The Applicant attended a Sunk User Group meeting to provide project update on 14th January 2025.</p> <p>The Applicant will bear in mind the need for enhanced communications with VTS and TSS operators, and plan to generate a communications protocol. This will be captured within the Navigation Installation Plan (NIP). Generally, the installation vessels will give a 48 hr lookahead to interested parties.</p> <p>The guard vessel will be transmitting warnings and notices.</p> | Under discussion |



| Ref   | Relevant Application Document | Summary of Description of Matter                                                                                                        | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Status           |
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|       |                               |                                                                                                                                         | It would be useful to have communication of when the works will happen and where (how long and which section).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                  |
| 3.1.4 |                               | Sunk TSS and VTS                                                                                                                        | The Consultee has no issues with being near or in the SUNK TSS's as long as there is a robust Vessel Management Plan in place, which should be consulted on with the SUNK VTS Manager who will also have a view on this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>The Applicant noted that proximity to the TSS is acceptable as long as this is managed robustly.</p> <p>The Applicant noted that the Sunk VTS Manager should be consulted. They were in attendance at the 7 June 2021 meeting with the MCA and PLA, and the 4 July 2022 meeting with the MCA and PLA.</p> <p>The Applicant commits to producing a Navigation Installation Plan (NIP), to communicate information regarding construction phase with the relevant stakeholders including the Sunk VTS Manager.</p> | Agreed           |
| 3.1.5 |                               | Rerouteing in 2021 -moving cable crossing points outside Margate and Long Sands SAC and into deeper water and deviation south of Thanet | <p>The proposed cable route should be the shortest route across the Long Sand Head two-way route.</p> <p>On moving cable crossing points outside Margate and Long Sands SAC, the Consultee has advised that the amended marine route is a better proposal compared to the previous version shared and keeps clear of the congestion of the other cable crossings and crossings are kept in deep water. There will be a temporary issue whilst cable is laid in northern part, but this can be managed through a robust vessel management plan.</p> <p>Deviation South of Thanet<br/>Amended route is in deeper water - new route is preferred, with deeper vessels using shelter and want to protect future depths.</p> <p>The Consultee is satisfied with the revisions to the cable location between the NE Goodwin and NE Spit that now includes an additional curve to increase water depth by</p> | <p>The Applicant noted that the route refinement in 2021 resulted in a preferable route to the PLA.</p> <p>The Applicant has provided the latest Order Limits to the Consultee (in July 2022 and again in December 2024).</p>                                                                                                                                                                                                                                                                                       | Under discussion |

| Ref   | Relevant Application Document | Summary of Description of Matter   | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Status           |
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| 3.1.6 |                               | Routing in 2023 (response to PEIR) | approximately 3.5 m (crossing is now in 16.5 m water depth).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Under discussion |
|       |                               |                                    | <p>At the Sunk the route goes east of the pilot diamond in water deeper than 20 m. The route then crosses the Long Sand Head two-way route, again in deeper water. The Consultee has no in principle concerns about this.</p> <p>The Consultee does however have concerns about the crossing of GridLink on the inshore side of the Thanet Windfarm. The charts used in the figures are not at a scale where it can be assessed if a 5% reduction in water depth would impact the 12.5 m the Consultee needs to safeguard in this area for southern access to the port. It is therefore not clear whether the Consultee's previously raised concerns have been fully addressed.</p> <p>The Option Selection and Design Evolution Report lists the factors considered in determining the corridor in Section 4.5.5, the Consultee is broadly content with the criteria but would suggest that they should also consider port facilities such as pilot stations which play a crucial role in the successful operation of a port.</p> <p>Whilst in broad terms the project seems to have considered the avoidance of crossings in shipping lanes and there is direct reference to cable crossings being outside the navigation channel and the need to maintain 22 m depth in DW routes (which should be 20 m draught vessels with an additional 10% under keel clearance), the Consultee cannot be fully re-assured until more detail is provided on the route.</p> | <p>Potential cables crossings are set out in the Environmental Statement. As above, the Applicant's current position is that a co-engineered solution would be designed which minimises the height of rock berms / protection structures but maintains required protection levels.</p> <p>The Applicant has discussed the matter of the GridLink crossing with the Consultee and is working on the possibility of moving the current planned cable route into deeper waters to the east within the Marine Order Limits in order to provide increased headroom at the expected location of the crossing with GridLink.</p> <p>Discussions are ongoing with the Consultee regarding commitments to safeguarding water depth at the three areas of PLA's Areas of Safeguarded Depth. The Applicant notes the Consultee's request to provide clarity and confidence surrounding cable crossings and potential impacts on water depths and seeks to engage further with the Consultee to provide assurance on this matter and provide greater clarity.</p> <p>Concerns about port facilities such as pilot stations are noted, and the Applicant is in communication with ports and harbour authorities in order to manage such potential risks. The Applicant commits to producing a Navigation Installation Plan (NIP) to effectively communicate with relevant stakeholders including ports and harbour authorities, in order to reduce any potential disruption to port and harbour facilities including pilot stations.</p> <p>The Applicant has provided the latest Order Limits to the Consultee (in July 2022 and again in December 2024).</p> <p>Regarding Deep Water Routes, the Applicant can confirm that unlike the Five Estuaries and North Falls projects, the Sea</p> |                  |

| Ref   | Relevant Application Document | Summary of Description of Matter           | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Status           |
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|       |                               |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Link cable route will not interact with the deep water routes 'Sunk deep water route' or 'Trinity deep water route'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                  |
| 3.1.7 |                               | Routing in 2024 (response to consultation) | The Consultee remains concerned about the Order Limits where Sea Link would cross GridLink. It is understood that the cable route was adjusted to allow the crossing to be slightly further east, in deeper water, to avoid a reduction in depth in the area of pilot boarding and landing at the NE Spit however the cable could still be buried on the western side, resulting in a crossing with GridLink, where a minimum 12.5 m depth could be compromised. As the Consultee has previously explained the Consultee needs to safeguard 12.5 m in this area for southern access to the port.                                                                                    | <p>Potential cables crossings are set out in the Environmental Statement. As above, the Applicant's current position is that a co-engineered solution would be designed which minimises the height of rock berms/protection structures but maintains required protection levels.</p> <p>The Applicant has discussed the matter of the GridLink crossing with the Consultee and is working on the possibility of moving the current planned cable route into deeper waters to the east within the Marine Order Limits in order to provide increased headroom at the expected location of the crossing with GridLink.</p> <p>Discussions are ongoing with the Consultee regarding commitments to safeguarding water depth at the three areas of PLA's Areas of Safeguarded Depth. The Applicant notes the Consultee's request to provide clarity and confidence surrounding cable crossings and potential impacts on water depths and seeks to engage further with the Consultee to provide assurance on this matter and provide greater clarity.</p> | Under discussion |
| 3.1.8 |                               | Approach to cable laying                   | In relation to cable laying where the proposed route goes near the Sunk area and close to boarding and landing areas, the Consultee expects the cable to be laid using the quickest method to achieve the required burial installation levels with no barges in the shipping channel. The approach to cable laying needs to be clear and there must be a commitment to the quickest method of cable burial which achieves the required burial depth in the vicinity of pilotage stations to reduce the impacts to shipping during construction. Construction and maintenance vessels must not hinder access or egress into/out of the Port nor the ability to board or land pilots. | <p>The Applicant acknowledges the importance of avoiding disruption to pilotage. The Project will seek the safest and most efficient methods within our means and will continue to engage with the PLA on process management plans to ensure that this can be achieved. Project operations will comply with all relevant safety regulations, as established in the Navigation and Installation Plan (NIP) and the Construction Method Statement. 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.</p> <p>The installation will be undertaken utilising Dynamic Positioning 2 cable installation vessel (it is only envisaged that a barge will</p>                                                                                                                                                                                                                                                                                | Under discussion |

| Ref | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Status |
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|     |                               |                                  | <p>Deep drafted vessels to terminals within the Port of London are tidally constrained, so a small deviation to their schedule could result in them not having enough water for their passage to the berth, thus delaying them until the next tide approximately 12 hours later.</p> <p>The consultation documents also advise: "Areas across the offshore route have been identified as high-risk shipping areas (KP35.089 to KP57.887 ('SUNK') and KP81.301 to KP96.343 (North Foreland)). The use of rock as trench backfill is preferred for these KP ranges, to protect the lowered cable within the trench. The additional rock emplacement being proposed to backfill the marine cable trench should not overtop the top of the trench, i.e. above Original Seabed Level. No different impacts have been identified on the seabed morphology and is likely to result in the same effects (no new or different effects) to those presented in the original PEIR for rock protection."</p> <p>The Consultee would expect further details to be provided about the proposed use of rock as trench backfill, including the safeguards that will be in place to ensure that all the fill is placed within the trench and that none ends up being placed/left on top of the surrounding seabed.</p> <p><b>Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users [APP-082]</b> states at paragraph 9.9.2:</p> <p><i>"Where burial cannot be achieved, rock backfill or external protection may be required where the soil or rock conditions are too hard to achieve effective burial, or third-party assets cross the route. Expected areas of rock backfill are located</i></p> | <p>be used in the nearshore area, primarily at Pegwell Bay). the Applicant will discuss the matter of barges at Pegwell Bay with the Consultee to try to reach agreement on this matter.</p> <p>The Applicant plan to avoid the use of cable joints where practicable in the Sunk region, in order to minimise the time spent during cable lay in this area.</p> <p>The Applicant have committed in the PEIR and Environmental Statement to not overtop the seabed.</p> <p>A technical note will be supplied at Deadline 1A which will provide a detailed response to the protection of under keel clearance across the three areas of interest identified by PLA London Gateway and HHA: (a) "Sunk Pilot Boarding area", (b) "Long Sand Head Two-Way Route crossing" and (c) North East Spit area". This will include an explanation of how the Applicant's proposed marine works (Work No.6) would not impede the dredging of those parts of the areas of interest to the following depths: (a) "Sunk Pilot Boarding area" to a level of 22 metres below Chart Datum (CD); (b) "Long Sand Head Two-Way Route crossing" to a level of 12.5 metres below CD and; (c) North East Spit area" to a level of 12.5 metres below CD. Recent discussions with PLA and HHA have also set the requirement for an additional allowance for an 'over-dredge' tolerance of 0.5 metres beyond the specified depths. The technical note will also detail any expected reductions in water depth greater than 5% at proposed crossings and explain how under keel clearance will be maintained in the three areas of interest.</p> <p>The Applicant is actively consulting with all relevant stakeholders to ensure a common understanding of their specific requirements, including geographic areas and the recent requirement for over-dredge tolerances. Technical assessments are ongoing to</p> |        |

| Ref | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                        | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Status |
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|     |                               |                                  | <p><i>between KP 38 to KP 58, and KP 81.5 to KP 96.5."</i></p> <p><b>Application Document 2.13 Design and Layout Plans [APP-037]</b></p> <p>illustrate on page 61 what this could comprise and whilst no dimensions are given it is clear that there would be reductions in water depth. This would not be appropriate within the Sunk (i.e KP38 to 58) or the Northeast Spit between KP 81.5 and 96.5.</p> | <p>facilitate final agreement and the wording of the proposed protective provisions.</p> <p>The primary methodology for protecting the cable and for installing the works (Work No.6) at a level which would not impede future dredging and would safeguard under keel clearance, is by lowering the cable below seabed to the proposed target depth of lowering. The Target Depth of Lowering (TDOL) along the Offshore Scheme is described in AS-018 Table 4.15. The minimum depth of lowering (DOL) to the top of the cable is 0.5 m in areas of weak bedrock Chalk, with a target DOL for the Proposed Project approximately 1 meter to 2.5 meters. In sections of the route identified as having the highest risk of cable strike due to marine traffic, a TDOL between 2.0 to 2.5 m is proposed. The trench along these sections – specifically KP 38 to KP 58, and KP 81.5 to KP 96.5 – is proposed to be backfilled using rock to a level below the original seabed level.</p> <p>Table 4.18 and 4.19 of AS-018 lists the developments also likely to cross the Offshore Scheme. Crossings of cables would be undertaken using agreed crossing designs in accordance with the crossing agreements with the third-party owners and would consider the requirements to safeguard under keel clearance. The proposed crossing locations within the three areas of interest, including in areas of bedrock (stiff clay or chalk) provide sufficient water depth to safeguard under keel clearance. The exception is the currently proposed Grid Link crossing location, where the agreed mitigation is to cross further east in deeper water within the order limits.</p> <p>The Applicant has submitted draft DCO and Deemed Marine Licence (DML) documents, with further updates to be incorporated as details are agreed with the various stakeholders. A first draft of the proposed wording for the Protective Provisions within the DCO has been provided to the PLA. The</p> |        |



| Ref    | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                  | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Status           |
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|        |                               |                                  |                                                                                                                                                                                                                                                                                                                                                                                       | <p>Applicant is currently reviewing the feedback and comments received from the PLA. Further discussions are ongoing with other relevant stakeholders including HHA and London Gateway.</p> <p>The Applicant is actively working to ensure a common understanding of the various stakeholders' specific requirements pertaining to the safeguard of water depth / under keel clearance as well as their requirements to consult on the proposed works (Work No.6) including survey, monitoring and preconstruction/construction activities.</p> <p>Once the Protective Provisions are finalised, subject to any necessary amendments, agreement will be reached on how to secure them within the DCO to the satisfaction of the stakeholders. The DML and Protective Provisions (or other agreed means of securing the requirements) will be provided alongside the draft management plans, such as the Navigation Installation Plan (NIP), and outline Cable Specification and Installation Plan (CSIP). Together, these are intended to provide stakeholders with the necessary assurance that the interests of shipping and navigation stakeholders will be protected both now and in the future.</p> |                  |
| 3.1.9  |                               | Order Limits                     | The Consultee considers the draft Order Limits to be wide and would expect the limits to be reduced as the project is refined. The Consultee is generally supportive of any reduction in the Order Limits offshore as Order limits should be the minimum necessary to deliver the scheme. The Consultee remains concerned about the Order Limits where Sea Link would cross GridLink. | Updated draft order limits and indicative route point line have been shared with the Consultee on 12 December 2024. It is standard practise to consent a corridor to allow for any necessary flexibility. Regarding the crossing of GridLink, the Applicant's current position is that a co-engineered solution would be designed which minimises the height of rock berms/protection structures but maintains required protection levels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Under discussion |
| 3.1.10 |                               | Burial Depth                     | The PEIR Non-technical Summary states a minimum DOL to the top of the cable of 0.5 m in areas of bedrock and a target DOL of approximately a minimum 1.5m. It is assumed this is burial depth, but it was not clear from the document. There is further reference to depths of drilling being unknown at this stage.                                                                  | A preliminary Cable Burial Risk Assessment (CBRA) has been undertaken which defines the target Depth of Lowering (DoL). The target DoL, is lowering of the cable relative to the seabed and/or a Non-Mobile Reference Level (NMRL). In areas of bedrock, 0.5 m DoL is specified, and in areas where geological conditions allow                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Under discussion |

| Ref    | Relevant Application Document | Summary of Description of Matter                    | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Status           |
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|        |                               |                                                     | <p>Consideration needs to be given to how burial depth is secured and how depths would be maintained e.g. avoidance of future rock protection for unplanned remedial activities which reduces depth.</p> <p>The PLA recommends following the approach at Five Estuaries where there is a Requirement within the dDCO and an associated certified plan clearly setting out that in the design, implementation, operation and maintenance of the authorised development and ancillary works the depths that need to be safeguarded. The PLA considers this should also be a condition in the DML</p> | <p>(sediment areas) a depth of lowering of between 1.0 m to 2.5 m has been specified. The preliminary CBRA identifies environmental factors which inform the derivation of DoL and also whether it can be met. The Draft CBRA has been submitted to PINS.</p> <p>A Burial Assessment Study (BAS) will be completed by the Contractor and will propose the primary and back-up cable lowering methodologies to ensure the DoL requirements can be met.</p>                                                                                     |                  |
| 3.1.11 |                               | Consultation                                        | The Consultee has repeatedly strongly urged the Applicant to engage with the Consultee, including when further surveys have been completed, before the route is finalised.                                                                                                                                                                                                                                                                                                                                                                                                                         | See Table 2.1 for a summary of engagement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Under discussion |
| 3.1.12 |                               | Consultation                                        | There are multiple ports and harbour authority areas which overlap with the shipping and navigation study area including the Port of London. The Port of Tilbury and London Gateway Port do not appear to have been engaged with prior to the submission of the application and it is unclear whether any terminals or shipping lines have been engaged with. The PLA would recommend as a minimum that views of the Port of Tilbury and London Gateway are sought on the proposed project.                                                                                                        | The Applicant notes the Consultee's recommendation to seek views from the Port of Tilbury and the London Gateway, and can confirm that the Applicant has received Relevant Representations from both of these stakeholders. Responses to these Relevant Representations, will be submitted to PINS at Deadline 1, in addition to this response. The Applicant can confirm that these two ports fall outside of the Proposed Project 10 NM shipping and navigation study area, however, we have sought to engage further with these two ports. | Agreed           |
| 3.1.13 |                               | Anchorage                                           | Of great significance is its proximity to anchorages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Nearby navigational features including anchorages are identified in <b>Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]</b> . This highlighted concern is noted by the Applicant.                                                                                                                                                                                                                                                                                                                      | Under discussion |
| 3.1.14 |                               | Temporary impacts from pre-construction surveys and | Sea Link has the potential to cause short and long term impacts to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Potential impacts to shipping and navigation are discussed in <b>Application Document</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Under discussion |

| Ref    | Relevant Application Document | Summary of Description of Matter         | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Status           |
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|        |                               | activities and post construction surveys | <p>navigation and to the capacity and operation of the Port of London, particularly from the works associated with the offshore HVDC cable.</p> <p>These impacts include: Temporary impacts from pre construction surveys and activities and post construction surveys.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203].</b></p> <p>The Applicant has submitted a first draft of proposed Protective Provision wording for the DCO to the Consultee, and is in the process of reviewing their comments, and discussing with other relevant Stakeholders to agree future wording in regard to consultation on survey, monitoring and preconstruction/construction activities.</p> <p>Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key project phases, in particular the construction phase.</p> <p>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.</p>                                                                                                                                                                                                          |                  |
| 3.1.15 |                               | Simultaneous operations                  | <p>The Proposed Project has the potential to cause short and long term impacts to navigation and to the capacity and operation of the Port of London, particularly from the works associated with the offshore HVDC cable.</p> <p>These impacts include: Temporary impacts from interaction with third party schemes (simultaneous operations).</p> <p>Due to multiple projects being proposed in this area including North Falls, NeuConnect, Gridlink, Nemo Link and Five Estuaries and existing cables including Britned there is the potential for simultaneous operations occurring during installation and maintenance. For the reasons set out above construction and maintenance vessels must not hinder access into and out of the Port of London.</p> | <p>Regarding the potential impacts of simultaneous operations, this matter is subject to further discussion and engagement between the Applicant and key shipping and navigation stakeholders. The Applicant is working with shipping and navigation stakeholders to reassure and find agreement on simultaneous operations concerns, including draft of Protective provisions wording.</p> <p>Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (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 <b>Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]</b>. 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 2025, as part of the</p> | Under discussion |

| Ref    | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                               | Status           |
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|        |                               |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Applicant's response to the ExA's s89(3) letter dated 5 August 2025.                                                                                                                                                                                                                                                                                                                                                           |                  |
| 3.1.16 |                               | Dredging                         | <p>The Proposed Project has the potential to cause short and long term impacts to navigation and to the capacity and operation of the Port of London, particularly from the works associated with the offshore HVDC cable.</p> <p>These impacts include: Temporary and permanent impacts from dredging.</p> <p>In order to install the cable it will be necessary to dredge and the DML authorises dredging for the purposes of seabed preparation for cable laying through sandwave clearance and removal of material from the seabed required for the construction of Work No. 6. There is a concern about a lack of controls in relation to the placing of inert material within Work No. 6. This could create high spots which ultimately impact on access to the Port of London by reducing navigable depth. Consistent with the approach at Five Estuaries and North Falls, the PLA would expect the Applicant to produce and submit into the Examination an outline Sediment Disposal Management Plan which sets out the approach to dredge disposal along the cable route, with specific consideration also given to the approach within the vicinity of pilot boarding areas and anchorages.</p> | The Applicant notes this position, and discussions with the Consultee are ongoing on the scope of the Sediment Disposal Management Plan.                                                                                                                                                                                                                                                                                       | Under discussion |
| 3.1.17 |                               | Minimum seabed depths plan       | Given the length of the offshore cable (approximately 122 km) and the various Ports requirements, it is recommended a plan is produced showing the minimum seabed depths that must be safeguarded along the entirety of the offshore route. Any cable installation, maintenance and cable crossings must ensure that these minimum seabed depths are met. The plan should be linked to a specific Requirement in the DCO and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>The Applicant notes the Consultee's request to produce a plan showing the minimum water depths to be safeguarded.</p> <p>This request comes as part of ongoing discussion between the Parties on the matter of safeguarding water depth within their three areas: Sunk Pilot boarding station area, Long Sand Head Two-Way Route crossing area, and Northeast Spit area. The Applicant is working with the Consultee to</p> | Under discussion |

| Ref    | Relevant Application Document | Summary of Description of Matter                             | PLA Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Applicant's Current Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Status           |
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|        |                               |                                                              | a condition in the deemed marine licence ("DML") which appears in Schedule 16 Part 2 of the DCO [APP-007] because if not the Proposed Project will limit the quantum of trade within the Port. The impact of this would be significant, detrimentally impacting the future of the UK's largest port. This approach would mirror the approach taken at Five Estuaries and North Falls.                                                                                                                                                                  | secure suitable Protective Provisions, and will continue to engage with the Consultee and aim to come to an agreement on what the Project is able to provide at this stage. These will be fully described and defined in the CSIP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                  |
| 3.1.18 |                               | Temporary Aids to Navigation                                 | The Shipping and Navigation Chapter of the ES [APP-080] refers to the potential need for aids to navigation where sections of cable are exposed for any significant lengths of time prior to burial. Further information should be provided, noting that the draft Statement of Common Ground with Trinity House [APP-333] states that they do not "always consider buoys suitable mitigation for exposed cables as they would need to be placed very close to the cable to be effective and could create an additional hazard for surface navigation. | The Applicant can clarify that the Proposed Project does not currently intend to utilise any temporary Aids to Navigation as part of the Proposed Project construction works but will liaise with Trinity House in the eventuality that they are considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Agreed           |
| 3.1.19 |                               | Approving surveys, monitoring or pre-construction activities | The PLA would want to approve any surveys or monitoring or pre-construction activities that affect its areas of interest because a survey vessel may pass slowly over an area or even stop to place/remove monitoring equipment which could affect shipping. Equally restrictions on how the pre-construction activity can be undertaken may need to be proposed e.g. boulders, archaeological finds and UXO cannot be relocated to or within the cable corridor but must instead be removed and no wet storage can occur in the cable corridor.       | The Applicant has submitted a first draft of proposed Protective Provision wording for the DCO to the Consultee, and is in the process of reviewing their comments, and discussing with other relevant Stakeholders to agree future wording in regard to consultation on survey, monitoring and preconstruction/construction activities. Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (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 <b>Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]</b> . 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 | PLA Current Position | The Applicant's Current Position                                                 | Status |
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|     |                               |                                  |                      | The Applicant can confirm wet storage is not applicable to the proposed project. |        |

3.2 Environmental Matters

Table 3.2 - Environmental Matters

| Ref   | Relevant Application Document | Summary of Description of Matter | PLA Current Position                                                                                                                                                                      | The Applicant's Current Position                                                                                                                                                                                                                                                                                        | Status |
|-------|-------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 3.2.1 |                               | Environmental matters            | Given the Consultee's experience with other projects, it is recommended that all the relevant environmental information (including any HRA information specifically) is provided upfront. | <b>Application Document 6.6 Environmental Information Habitats Regulations Assessment Report [APP-290]</b> was submitted as part of the DCO application. An update to this report <b>Application Document 6.6 (C) Environmental Information Habitats Regulations Assessment Report</b> will be submitted at Deadline 1. | Agreed |

# 4. Approvals

|              |               |
|--------------|---------------|
| Signed       |               |
| On Behalf of | National Grid |
| Name         |               |
| Position     |               |
| Date         |               |

|              |                          |
|--------------|--------------------------|
| Signed       |                          |
| On Behalf of | Port of London Authority |
| 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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