



Maritime &
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25th November 2025

Via email: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Sir/Madam

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

Supplementary Questions at Deadline 1A (26th November 2025)

In accordance with Issue Specific Hearing 1 Supplementary Agenda Additional Questions, The Maritime and Coastguard Agency (MCA) have been asked to respond to two Supplementary Agenda Questions – ISH 1.06 and ISH 1.07. Our responses are as follows:

- 1) **ISH 1.06 Do you have baseline information for the depth below chart datum across the Sunk and other important shipping routes on the proposed cable route?** If so, please provide a summary of the information to the ExA.

The MCA has access to nautical charts and publications, which are used to identify water depths at specific locations, and these charts inform our decisions on navigation safety. In addition, the MCA has access to up-to-date Electronic Navigational Charts (ENCs) provided by the UK Hydrographic Office (UKHO). For the assessment of the planned cable route, the MCA has relied on the charted depths of the area through which the route passes.

The SUNK area represents the primary pinch point along the cable route due to its relatively shallow water depth combined with the deep draughts of vessels operating there (see Fig. 6.4.4.7.A.15 of APP-284). In contrast, areas such as North Shipwash (between KP15 and KP20) experience high concentrations of vessels crossing the proposed cable route (see Fig. 6.4.4.7.A.11 of APP-284), but the charted depth is approximately 20 m, and most vessels have a maximum draught of less than 10 m. Consequently, this area is currently considered less critical.

The SUNK area of concern extends from KP30 to KP70, where there is a high concentration of commercial traffic, including ultra-large vessels operating mainly within restricted depths; particularly between KP30 and KP40 (as noted in APP-284). From KP40 to approximately KP60–65, water depths are generally greater than 20 m. Provided the applicant achieves cable burial as outlined in Table 24 of the draft Cable Burial Risk Assessment (PDA-039), we would consider this section acceptable.

Between KP60 and KP65, most vessels have draughts of 10–15 m (see Fig. 6.4.4.7.A.15 of APP-284). The minimum depth along the cable route in this section is 17.8 m. If the draft CBRA is complied with, we believe the risk of reduced under-keel clearance can be minimised. From KP85 to KP95, most vessels again fall within the 10–15 m draught range, with the minimum depth along the route being a 14 m patch, which vessels generally avoid. The next minimum depth is 17.6 m, and the draft CBRA specifies cable burial to 2.5 m below the seabed in this area, which we consider acceptable.

Between KP95 and KP105, west of the Thanet Offshore Wind Farm, lies another chokepoint identified in our written and relevant representations. This area sees vessels with draughts of 10–15 m and occasional transits of vessels exceeding 15 m (see APP-284, Fig. 6.4.4.7.A.15). The draft CBRA proposes burial to 0.5 m below the seabed here; however, we request the applicant to consider deeper burial, as they have identified the presence of deep-draught vessels operating in this area. We expect the project to avoid any further reduction in navigable depth in this area.

Finally, west of Goodwin Knoll and approaching Pegwell Bay, water depths are often below 10 m. However, as vessels operating here are of shallow draught, we consider this a lower risk, provided the cable is buried and does not reduce navigable depth.

In summary, the minimum depth the cable route passes through within the SUNK Inner Precautionary Area is 17.9m, which is West of the SUNK Deep-Water Route. There is a 16.4m depth patch just outside the cable route between the Storm buoy and the SUNK W1 buoy.

2) What would be the effects of a reduction in under keel clearance below 22 metres in the Sunk or other key areas for large vessel traffic to ports?

Kindly note that the request raised by MCA and the port authorities is to bury the cable to 22m below chart datum, not for under keel clearance of 22m. This is to future-proof the likelihood of deeper vessels up to 20m draught can approach the said area with a 10% under keel clearance, which is 2m.

The MCA is aligned with the Ports on this matter and recommends that the cable be buried to a depth of 22 m below Chart Datum (CD). This depth ensures future safe passage for vessels with draughts up to 20 m (current maximum: 17.1 m, MSC ELENOR). This depth provides 10% Under Keel Clearance (UKC) for 20m draught vessels. Reducing UKC below this threshold would pose significant navigational safety risks.

The 20 m draught is static; when a vessel moves, its draught increases due to factors such as speed, block coefficient, and prevailing weather conditions. This hydrodynamic phenomenon is known as the squat effect. The 2 m (10%) UKC allowance accounts for this dynamic increase leaving a residual clearance.

Insufficient clearance could lead to grounding in the SUNK area, causing severe disruption to Thames Estuary ports and SUNK area. The worst-case outcomes include structural damage, pollution, container loss, and even loss of a crew member, or multiple serious injuries (Major/Severe damage to infrastructure or vessel, as noted in the applicant's Navigation Risk Assessment (Annex 4.7.A.1 Hazard Log)). The most likely outcome being major/severe damage to infrastructure or vessel. This also depends on the nature of the seabed and intensity of the impact. Such incidents could escalate into international crises, damaging reputation and trade. Vessels comparable to the EVER GIVEN, which blocked the Suez Canal in 2021, transit this area daily.

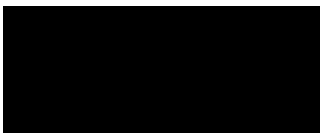
Additionally, the proposed cable route lies close to the SUNK Deep-Water Anchorage, where similar large vessels anchor. If cables are inadequately buried, anchor dragging during extreme weather could damage cables, foul anchors, and result in vessel incidents. This will cause additional issues in an already complex area for navigation. The Hazard Log identifies worst credible outcomes for anchor drag onto an exposed cable as loss of a crew member, or multiple serious injuries (Major/Severe damage to infrastructure or vessel) and the most likely outcome being notable damage to infrastructure or vessel.

As previously highlighted, the SUNK area is very busy with converging marine traffic with many vessels, including some of the largest in the world, heading in or out of some of the busiest ports in the UK. The SUNK region is highly constrained with dense maritime traffic, challenging environmental conditions, specialist pilot boarding arrangements. The risks of collision or running aground here could have catastrophic consequences.

The Sunk area is subject to relatively unpredictable and often harsh conditions, strong tidal currents, high winds, and low visibility. Navigating these challenges demands high levels of experience and skilled pilots. The conditions can also change rapidly, making it essential for Pilots to continuously monitor the situation and adapt their approach. The Sunk area itself is near shallow waters, sandbanks, and other underwater obstacles.

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

Yours faithfully,



Marine Licensing and Offshore Consenting Manager
UK Technical Services Navigation