THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

SEA LINK DEVELOPMENT CONSENT ORDER

PINS REFERENCE EN010119

DEADLINE 1A: WRITTEN SUMMARY OF ORAL
SUBMISSIONS MADE ON BEHALF OF

LONDON GATEWAY PORT LIMITED



AT ISSUE SPECIFIC HEARING 1

ADDLESHAW GODDARD

This is a written summary of the oral submissions made on behalf of London Gateway Port Limited (IP REF: (ISH2) on 11 November 2025.

) during Issue Specific Hearing 1

Agenda Item 5

Cumulative Impacts

Shipping and navigation in the Sunk and the implications of cable burial depth for under-keel clearance.

Although listed under the heading of Cumulative Impacts, LGPL's view is that the impacts on shipping and navigation, particularly the effects on navigable depths, about which LPGL and the other ports are concerned are not cumulative impacts, rather they are direct effect of the Applicant's scheme in its own right, specifically a direct effect of Work No. 6 in the dDCO [AS-087].

LGPL has no concerns in relation to the Application other than the effects of Work No. 6 and its carrying out. Work No. 6 has impacts that concern LGPL which need to be mitigated by both a requirement as to depths and some input of LGPL into the methodology of how it is carried out.

There are *additional* cumulative effects the flow from this scheme and other schemes in relation to cable crossings, but those effects are a concern over and above the direct effects of this scheme.

There are various statements in the Application in relation to the nature and effects of the scheme on navigable depth (see for example Project Description [AS-94]) but in terms of the actual documents that will authorise the scheme, i.e. the dDCO [AS-087], we see nothing at all about how those statements are secured.

The deemed marine licence (DML) included in the dDCO references a number of plans – LGPL is wondering whether any of those plans will be forthcoming soon so that LGPL can take into account what they are saying. The plans include: cable protection plan, cable laying and burial plan, cable specification and installation plan and outline navigation and installation plan. If the Applicant is intending that various commitments and mitigations are to be secured by those plans, it is important that LGPL and the ExA see those plans as soon as possible.

To give advance notice of what LGPL will be seeking in its Written Representations (WRs), LGPL will be requesting that a Requirement be included in the dDCO to secure the ability to dredge to specified depths in specified areas and that LGPL, either via conditions on the DML or by protective provisions to the dDCO, will an approval right over the relevant parts of the relevant plans that relate to the laying of the cables in the relevant

	areas. LGPL will explain in its WRs why that is important and why vessels bound for London Gateway Port cannot be interrupted for more than a certain period of time.
Agenda Item 9 Any other business	LGPL would like to request the ExA places an action point on the Applicant to confirm whether or not the plans referred to previously will be made available and, if so, when.

26 November 2025