

Examining Authority's First Written Questions (ExQ1) Issued 17 December 2025

In response to the Examination Authority's first written questions issued on 17 December 2025, the MCA would like to comment as follows at Deadline 1, 9 January 2026.

ExQ1	Question to:	Question	Response from MCA
Q1.11.1 DCO ([CR1-027] unless otherwise stated)			
1GEN67	Applicant Natural England MMO	<p>Surveys and monitoring conditions</p> <p>Applicant - It is common with DMLs as part of DCOs which have an offshore element for there to be a condition requiring details of planned pre-construction surveys and monitoring to be agreed with the MMO and NE. Notwithstanding the details within the submitted oOCEMP, is there a need for such a condition to be within the DML to secure this?</p> <p>Similarly, is there a need for a condition within the DML for post-construction monitoring, to include adaptive management where necessary, with details and methodology to be first agreed with MMO and NE?</p> <p>NE and MMO - If considered necessary is there wording that could be suggested.</p>	<p>Although this question is not directed at the MCA, we would like to offer the following comment for the ExA's consideration.</p> <p>The Maritime and Coastguard Agency (MCA) would expect a Navigation Installation Plan (NIP) for the key areas of interest (AOI), a Vessel Traffic Management Plan (VTMP) for the full cable route (see question QISN17 below), adherence to the Cable Burial Risk Assessment and a post-burial survey report to confirm target depths to be secured through conditions of consent in the DCO DML. The MCA would like to ensure that these are agreed by the MMO in consultation with the MCA and the relevant ports.</p>
Q20 Shipping and Navigation			
QISN3	Applicant and relevant stakeholders	Depth of lowering	

		<p>Provide an update on reaching an agreement with the relevant stakeholders on safeguarding current and future navigable water depths. In responding, explain how DoL commitments can most effectively be secured in order to secure existing and reasonable future under keel clearance requirements. If this is to be through protective provisions, provide suggested wording for how this can be appropriately secured. Also explain any alterations or additions to the REAC, for example MPE02.</p>	<p>The MCAs' primary concern is to safeguard navigation safety for current and future vessel traffic, and this is of particular concern within the SUNK precautionary area at KP 33 to KP 45.</p> <p>The MCA requests that the applicant include a DCO-DML condition requiring the cable to be buried to a depth of at least 22 metres below chart datum. For the remaining sections of the cable route, the MCA is satisfied with the approach outlined in the Cable Burial Risk Assessment (PDA-039). If the applicant can commit to the Depth of Lowering (DoL) specified within the CBRA, the MCA considers that the risk to navigation safety will be reduced to As Low As Reasonably Practicable (ALARP).</p> <p>The applicant has committed to 12.5m depth below chart datum to be maintained within the Long Sand Head (LSH) two-way route and at the Northeast Spit which has been agreed with the ports for their purposes and the MCA fully supports. The MCA would also like a minimum of 12.5m depth to be maintained.</p> <p>In addition, from our data we can see vessels of more than 11m draught passing through the LSH in 2024 and considering the water depth available at this location (around 17-18m plus) the 12.5m allows the potential for a 6m plus reduction in navigable depth, which seems excessive considering there are no cable crossings here. Whilst the MCA supports the need for at least 12.5m, we believe the applicant can easily achieve more at this location. We would therefore like the applicant to ensure burial as identified within the CBRA and apply the 5% maximum depth reduction. This is also identified by the applicant in their CBRA. [PDA 039].</p> <p>The MCA will need more information and further consultation if there is <u>any</u> depth reduction <u>within KP45 to KP85</u>.</p>
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QISN7	Relevant stakeholders including	Cable burial risk assessment (CBRA)	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.

	<p>London Gateway Port Ltd (LGP), Maritime and Coastguard Agency (MCA), Port of London Authority (PLA), Harwich Haven Authority (HHA)</p>	<p>Provide comments on the submitted CBRA [PDA-039].</p>	<p>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.</p> <p>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. We would expect the project to bury the cable to 22m below Chart Datum from KP33-45 as explained previously.</p> <p>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.</p> <p>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</p>
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QISN14	Applicant Harwich Haven Authority, London Gateway Port Ltd, Maritime and Coastguard	<p>Exclusion zones</p> <p>The applicant has stated in section 7.3 of ES Part 4, Chapter 7 Shipping and Navigation [REP1-059] that exclusion zones will not be required. Does this need to be added to the REAC to be secured?</p>	<p>The MCA agrees with Harwich Haven Authority's recommendation of no exclusion zones within the Sunk Area or channel that would restrict 24/7/365 vessel access requirements or pilot boarding operations. This should be applicable to all RAM activities, including cable laying and survey operations, and the MCA would prefer this to be secured through a condition of the DCO/DML.</p>

	Agency, Port of London Authority		<p>The applicant has stated within the ES Part 4, Chapter 7 Shipping and Navigation and Part 4 Marine Chapter 7 Appendix 4.7.A Navigational Risk Assessment that a rolling Recommended Restricted Zone (RRZ) may be established around the installation vessel. We note from the Navigation Risk Assessment section 7.9 that the RRZ would not appear to impact the Pilot boarding station at the Sunk, as the Offshore Scheme is 2 km distant from the Sunk pilot station at all points along the Offshore Scheme Boundary.</p> <p>However, these will nonetheless be in force by guard vessel at all times during the operation including whilst passing through the Sunk TSS. RRZs would be established with communication to stakeholders and advanced notice to all and in liaison with Harwich and Sunk VTS. We note from the NRA and consultation from ports that pilots board larger vessels at around approximately 1.5 km east of the charted location of the Sunk pilot station. Therefore, the condition, where secured, should include the above statement stating RRZ should only be established in consultation with HHA and other stakeholders particularly in the vicinity of the SUNK PBG.</p>
QISN15	<p>Applicant</p> <p>Maritime and Coastguard Agency</p>	<p>Magnetic compass deviation</p> <p>In the draft Statement of Common Ground with the MCA [REP1-081], the applicant states that a full update to the Electromagnetic Field report will be carried out once a full analysis update has been carried out pre-construction and will be shared with the consultee at the earliest opportunity. Can the applicant clarify whether this will be submitted to the</p>	<p>We note that once the technical parameters are finalised, the applicant intends to do a detailed EMF study pre-construction. We are content with this approach as long as there are no significant changes to the proposed installation methodology and parameters as mentioned within the Electric and Magnetic Field compliance report (APP-289), particularly to the bundling of the cable.</p> <p>MCA would require the applicant to ensure that there is no greater than 3 degrees of compass deviation for 95% of the cable route and no more than 5 degrees of compass deviation for the remaining 5% of the route. If the applicant is unable to meet this requirement, a post-installation actual compass deviation study</p>

		<p>examination or whether it intends for this to be post consent.</p> <p>Can the MCA comment as to whether it is necessary for this information to be made available prior to the decision being made on the DCO.</p>	<p>may be required to ascertain the actual compass deviation, and the details should be shared with the UKHO to be included on the relevant navigational charts.</p> <p>Therefore, nothing further is required prior to the decision being made on the DCO on the understanding that the MCA requirement is made a condition of consent.</p>
QISN17	Applicant and relevant stakeholders	<p>Vessel management plan (VMP)</p> <p>Several stakeholders have requested a VMP. Can the applicant confirm that their proposal is that this takes the form of a navigation and installation plan (NIP), for which an outline version has been submitted [AS-104]?</p> <p>Taking into account that section 1.2 of [AS-104] states that project activities outside of the three defined areas of interest are not covered by the NIP, can the applicant confirm that it does not consider that there is a need for a VMP with a wider geographical scope.</p> <p>Can the stakeholders provide comment as to whether they are satisfied that a separate VMP is not required.</p>	<p>The current NIP only provides details for the operational aspects of how the installation will be carried out within the SUNK, NE Spit and Kent landfall areas of interest as per section 1.2 of NIP AS-104.</p> <p>The MCA requests specific areas of interest which extend beyond the ports' areas of interest in order to secure our safety of navigation interests. The current NIP boundaries do cover the key areas of concern; i.e, SUNK (KP 35-55), NE Spit area (KP 85-104) and approaches to Ramsgate. However, there are other key areas which fall outside the NIP and are concerning from the safety of navigation perspective, including East of North Shipwash, SUNK outer Precautionary Area, and the Long Sand Head two way route.</p> <p>The MCA would therefore expect a Vessel Management Plan (VMP) which should cover the entirety of the project and focus on the overall coordination and safe operation of all vessels involved in the project. VMPs usually cover the constructional phase and how applicant vessels (installation vessels) will be managed to reduce the impact on other sea users.</p> <p>We note the applicant is providing a VMP for environmental purposes and the MCA would appreciate the opportunity to review the VMP as it should detail vessel movements. This will be discussed further with the applicant on 16th January.</p>

QISN19	<p>Applicant</p> <p>Port of Ramsgate</p>	<p>Navigational Risk Assessment</p> <p>Port of Ramsgate to provide comments on the NRA [REP1-064] including in relation to potential future impacts on commercial ferries.</p> <p>Applicant to engage with the MCA in relation to their suggested additional risk mitigation measures [REP1-162] in relation to ensuring that the risk to shipping and safe navigation is As Low As Reasonably Practicable (ALARP).</p>	<p>Although this question is not specifically directed to the MCA, we wish to note that the MCA will continue to engage with the applicant to ensure that appropriate risk mitigation measures are secured within the DCO-DML, thereby reducing risk to ALARP. Further work is required on the DCO-DML to incorporate and secure the MCA's conditions.</p>
Q22 Other Sea Users			
Q1OSU2	<p>Applicant</p> <p>Relevant Stakeholders</p>	<p>Cable crossings</p> <p>Applicant - It is stated in the responses to the Supplementary Agenda Additional Questions [REP1A-033] ISH1.03 that the expectation is that there are no areas where the Sea Link cables cannot be buried, and that surveys indicate that existing in-service cables are buried, so that there would not be a scenario where Sea Link cables would cross over unburied cables. Each individual crossing location would be surveyed in detail and would be agreed with each crossing agreement with the third-party asset owner. Provide an explanation of how</p>	

	<p>this will be secured in the dDCO.</p> <p>Applicant - Stakeholders such as London Gateway Port Ltd (LGP) and Port of London Authority (PLA) require that there are no cable crossings at all in the Sunk, Long Sand or North East Spit. Would it be appropriate to include a requirement or DML condition that prohibits cable crossings in these areas?</p> <p>Applicant and relevant stakeholders - Cable crossing agreements with third-party asset owners have not been included in table 2.1 of the Consents and Agreements Position Statement [APP-010]. Give consideration as to whether they should be added.</p>	<p>It is MCA's view that these <u>should</u> be included within table 2.1 of the document APP-010.</p> <p>For cable crossings, the cable protection measures installed in cable crossing areas should not reduce the depth of water by more than 5% of chart datum. If the applicant is unable to meet this, they should consult with the MCA and other relevant stakeholders to ensure that the risk to navigation is reduced to ALARP. We would recommend the applicant ensures maximum burial in areas where <u>planned</u> cable crossings are expected so there is minimal reduction in depth.</p>
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