

Sea Link

Volume 7: Other Documents

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

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<u>January 2026</u>	<u>C</u>	<u>DRAFT</u>	<u>Issued to PINS for Deadline 3</u>

1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application ('The Application') for the Sea Link Project ('Proposed Project') made by National Grid Electricity Transmission Ltd ('the Applicant'). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared between the Applicant and Maritime and Coastguard Agency (MCA). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).
- 1.2.2 An early draft SoCG was prepared by the Applicant to submit with the DCO application, based on engagement with MCA throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with MCA to resolve issues as the project progresses through the Pre-Examination and Examination phases.
- 1.2.3 This draft SoCG was shared with the MCA shortly before Deadline 1. Due to the limited time before the deadline, no comments have yet been received on this version. Any new matters added since then are marked as "under discussion." The Applicant will continue collaborating with the MCA to resolve issues during the Examination phase and will update future versions of the SoCG to reflect any agreements reached.
- 1.2.4 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and MCA and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.
- 1.2.5 For the purpose of this SoCG, the Applicant and the MCA will jointly be referred to as the 'Parties'. When referencing the MCA alone, they will be referred to as 'the Consultee'.

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

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

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

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

1.3.4 The Consultee is also the National Competent Authority for Vessel Traffic Services (VTS) appointed by DfT under SOLAS Chapter V - Regulation 12. VTS Centres are either operated by Ports or lay outside of the legal authority of a port and thus must be operated by a Coastal State. The MCA operates two 'Coastal' VTS Centres, the SUNK and Channel VTS. His Majesty's Coastguard (HMCG) have responsibility for the day-to-day operation of Sunk and Channel.

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 Frome) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme:

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme:

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

1.4.6

The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses,

bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PRoWs) and other ancillary operations.

1.5 Format of Document and Terminology

- 1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.5.2 Section 3 of this SoCG summarises the issues that are ‘agreed’, ‘not agreed’ or are ‘under discussion’. ‘Not agreed’ indicates a final position where the Parties have agreed to disagree, whilst ‘Agreed’ indicates where the issue has been resolved.
- 1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
DfT	Department for Transport
EIA	Environmental Impact Assessment
EMF	Electromagnetic Field
ES	Environmental Statement
ESO	Energy System Operator
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
NIP	Navigation Installation Plan
NRA	Navigational Risk Assessment
PLA	Port of London Authority
PRoW	Public Right of Way
SAC	Special Area of Conservation
SoCG	Statement of Common Ground

Abbreviation/Term	Definition
TJB	Transmission Joint Bay
TSS	Traffic Separation Scheme
UKMA	UK Masters Association
VTS	Vessel Traffic Services

2. Record of Engagement

2.1 Summary of pre-application discussions

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

Table 2.1 Pre-application discussions

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

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

2.2 Summary of post-application discussions

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

Table 2.2 Post-DCO application discussions

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

Date	Topic	Discussion points
		electromagnetic fields and shipping and navigation.
<u>11 December 2025</u>	<u>Areas of Interest</u>	<u>Discussion of Areas of Interest across the offshore route for safeguarding of water depths.</u>

3. Areas of Discussion Between the Parties

3.1 Assessment Methodologies

Table 3.1 Assessment Methodologies

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.1.1	Application Document 6.14 Environmental Scoping Report 2022 [APP-299] Application Document 6.15 Scoping Opinion 2022 [APP-300]	Environmental Impact Assessment (EIA) Scoping Report	The Consultee confirms EIA Scoping Report is adequate. <u>The Consultee provided a range of aspects to consider as the project progresses to ensure the safety of navigation is maintained during and after installation.</u>	The scope of the EIA that is set out in the Applicant's scoping report (see Application Document 6.14 Environmental Scoping Report 2022 [APP-299]), taking account of the Consultee's comments made in its response to the request for a scoping opinion (see Application Document 6.15 Scoping Opinion 2022 [APP-300]), is adequate.	Agreed

3.2 Shipping and Navigation

Table 3.2 Shipping and Navigation

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.2.1	N/A	Sunk Vessel Traffic Services (VTS) Coastal VTS	<p>The Consultee confirmed the MCA is responsible for Sunk VTS and any matters regarding the Sunk VTS should be discussed with the Consultee.</p> <p>The Consultee confirmed the Coastal VTS is run by Dover Coastguard and to speak to MCA regarding this as they are involved in discussions with other developers.</p>	<p>The Applicant has noted this clarification from the Consultee.</p> <p>The Applicant has initiated contact with Dover representatives regarding the Coastal Vessel Traffic Services (VTS).</p>	Agreed
3.2.2	Application Document 6.3.4.7A ES Appendix 4.7.A (B) Navigational Risk Assessment [APP-203] Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1-064] Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	Reduction in water depth	<p>The Consultee confirmed there would be a concern if there would be any reduction in water depth particularly in relation to access to Harwich Haven, Felixstowe and the PLA port and crossing in deep water channel.</p> <p>The Consultee noted that 5% change in water depth is a trigger point for discussion on impact with National Grid, although any reduction in an area with minimal vessel clearance should be discussed further and secured through a condition of consent.</p> <p>The Consultee also noted that any depth reduction in areas where deep-draught vessels operate must be reviewed. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA and secured through consent conditions. This is especially critical near North Shipwash, the SUNK area (including W1, precautionary areas, and the Long Sand Heads two-way route), west of Thanet OWF, and approaches to Pegwell Bay. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met.</p>	<p>Water depth reduction is discussed in the Navigational Risk Assessment (Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203])-(B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-064]). Additionally, the Applicant has produced a technical note (Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]) which provided further detail on cable crossings and potential impacts on under-keel clearance.</p> <p>The Applicant agrees that a 5% change in water depth would require further discussions with the Consultee if this were to occur.</p> <p>The Applicant notes the Consultee's concerns regarding navigable depth and protective measures, and the particular areas of concern listed which include near North Shipwash, the SUNK area, west of Thanet OWF, and approaches to Pegwell Bay.</p> <p>The Applicant has been working with stakeholders including PLA, London Gateway Port and HHA, to understand the areas where they wish to safeguard water depth, and will continue to do so through Examination with the goal of providing clarity, reaching agreement on this matter, and minimising potential impacts.</p>	Under discussion
3.2.3	Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]	Communication plans Coastal VTS	<p>The Consultee confirmed that given the Coastal VTS is run by Dover Coastguard complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital.</p> <p>The MCA would expect a Navigation Installation Plan (NIP) for the key areas of interest (AOI), and a Vessel Traffic Management Plan (VTMP) for the full cable route.</p>	<p>The Applicant is preparing a Navigation Installation Plan (NIP) to provide necessary communications with key stakeholders including the Consultee, the Sunk VTS and relevant port authorities and provide vessel management details. This is noted in Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059].</p> <p>The Applicant agrees on the importance of proactive and transparent communication with ports, harbours, and Estuary Services.</p>	Agreed Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
	Application Document 7.8 Red-Throated Diver Protocol [APP-361]		<p>The NIP is currently specific to the Ports AOI.</p> <p>The MCA stresses the importance of proactive and transparent communication with ports, harbours, and Estuary Services. Installation vessels must clearly communicate their intentions and activities speak to MCA regarding ensure safe operations in this as they are involved in discussions with other developers. The proposed route intersects one of the UK's key routing measures. The project team must take all necessary steps to minimise navigational risks and ensure that all activities in the SUNK region are promptly communicated to SUNK VTS and relevant port authorities.</p> <p>Any survey works conducted within the SUNK area must also be coordinated with the relevant port authorities and the MCA.</p>	<p>The Applicant has initiated contact with Dover representatives regarding the Coast 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 notes the expectation of a Vessel Traffic Services (VTS) Management Plan. As set out in Application Document 7.8 Red-Throated Diver Protocol [APP-361], the Applicant has included a commitment to develop a Vessel Management Plan (VMP) post consent which will be prepared in consultation with Natural England to minimise disturbance to Red-Throated Diver. However, the Applicant considers that a Vessel Traffic Management Plan is not required for the Sea Link project in regard to shipping and navigation. The Applicant has committed to the production of a Navigation and Installation Plan (NIP), which provides relevant project details to stakeholders enabling communication and collaboration, and represents a key management of risk with regard to shipping and navigation at the key areas identified through consultation with stakeholders. The Applicant considers that as this is an offshore cables project rather than a wind farm, and there will only be a limited number of project vessels operating in the cable corridor at any one time, a VTMP for the whole route would not be proportionate.</p>	
3.2.4	Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [REP1-064]	Pilot boarding areas (Sunk and Tongue) Communication plans	<p>The Tongue pilot boarding area is specifically for PLA inbound / outbound vessels, operated by Estuary Service operating out of Ramsgate. They would need to be aware of the work and be part of the consultation process.</p> <p>The Sunk Pilot station is for vessels inbound from both PLA, Harwich and Felixstowe. The pilot service is operated by HHA to serve both their own traffic but also to board PLA pilots.</p> <p>Management measures would need to put in place to manage the impacts during cable installation in this area. The Consultee confirmed no issues with the planned Sea Link cable route passes near to Sunk pilot station and would need a good vessel management plan for construction.</p> <p>Survey work must be communicated widely and intentions made clear prior to commencement of work and facilitate clear communications when working in the area.</p> <p>The Consultee also noted an initial navigational concern in the areas north into the Shipwash but understood this is away from pilots.</p> <p>The Consultee advised National Grid to be aware of the location of Tongue pilot boarding station. Management measures would need to put in place to manage any impacts during cable installation in this area. The Consultee noted the more sea room</p>	<p>The Applicant proximity of the planned route to pilot boarding areas is preparing aacknowledged. A Navigation Installation Plan (NIP) is being produced post-DCO application submission to provide necessary communications with key stakeholders including the Consultee, the Sunk VTS and relevant port authorities and provide vessel management details. This is noted in Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080].</p> <p>The Applicant agrees on the importance of proactive and transparent clear communication with ports, harbours, and Estuary Services throughout cable construction activities. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.</p> <p>The Applicant confirmed the proposed Sea Link marine route passes reasonably close to the Tongue pilot boarding station. Again, it was agreed that good communication using a Navigation and Installation Plan (NIP) around Tongue will help to mitigate impacts.</p> <p>Any potential risk of disruption to pilot boarding areas is considered in Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-064].</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
			<p>to the east of the Tongue pilot station and confirmed that with a traffic management plan in place it shouldn't have detrimental impact on pilot boarding., but to communicate</p> <p>The Consultee notes that the proposed cable corridor proximity to the Tongue Pilot Station necessitates consultation with the MCA.</p> <p>Estuary Services and the Port of London Authority (PLA), who are likely to be most affected by any potential restrictions. The MCA stresses the importance of proactive and transparent communication with ports, harbours, and Estuary Services. Installation vessels must clearly communicate their intentions and activities to ensure safe operations in this critical area. The proposed route intersects one of the UK's key routing measures. The project team must take all necessary steps to minimise navigational risks and ensure that all activities in the SUNK region are promptly communicated to SUNK VTS and relevant port authorities.</p> <p>Any survey works conducted within the SUNK area must also be coordinated with the relevant port authorities and the MCA.</p>	<p>The Applicant agreed that it was an important design criterion to avoid pilot areas and locate away from anchorage areas.</p> <p>The Applicant agreed that a vessel management plan is a good idea to manage construction risks. This will take the form of an NIP.</p> <p>The Applicant has undertaken consultation with the PLA and will continue to do so throughout the pre-Examination and Examination phases. The Applicant interprets that 'Estuary Services' in this context refers to 'Estuary Services Ltd', which the Applicant understands is a subsidiary company owned by PLA, and thus will have had input into PLA consultation.</p>	
3.2.5	<p>Application Document 6.3.4.7A ES Appendix 4.7.A Navigational Risk Assessment [APP-203] REP1-064]</p>	<p>Pilot boarding areas (Sunk Notifications to local ports and Tongue) users</p>	<p>PLA pilot boarding area - Management measures would need to put in place to manage the impacts during cable installation in this area.</p> <p>The Consultee confirmed the planned Sea Link cable route passes near to Sunk pilot station and would need a good vessel management plan for construction. For surveys it wouldn't be too much of an issue from initial review of the proposed route presented.</p> <p>The Consultee advised National Grid to make sure the right notifications to local ports and users are issued. The Consultee also noted an initial navigational concern in the areas north into the Shipwash but understood this is away from pilots.</p> <p>The Consultee advised National Grid to be aware of the location of Tongue pilot boarding station. Management measures would need to put in place to manage any impacts during cable installation in this area. The Consultee noted the more sea room to the east of the Tongue pilot station and confirmed that with a traffic management plan in place it shouldn't have detrimental impact on pilot boarding. MCA are comfortable with route around Tongue (as per image below).</p>	<p>The proximity in mitigation of such risks the planned route to pilot boarding areas is acknowledged. A Navigation Installation Plan (NIP) is being produced post DCO application submission to provide clear communication throughout cable construction activities. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.</p> <p>Intends to issue Notice to Mariners, and navigation warnings. The Applicant confirmed the proposed Sea Link marine route passes reasonably close to the Tongue pilot boarding station. Again, it was agreed that good communication using a vessel management plan around Tongue will help to mitigate impacts.</p> <p>Any potential risk of disruption to pilot boarding areas is considered be sent to a distribution list which will include Port and Harbour Authorities. This is noted in Application Document 6.3.4.7A7A (B) ES Appendix 4.7.A Navigational Risk Assessment [APP-203].</p> <p>REP1-064] The Applicant agreed that it was an important design criterion to avoid pilot areas and locate away from anchorage areas.</p> <p>The Applicant agreed that a vessel management plan is a good idea to manage construction risks. This will take the form of an NIP.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
				<p>The Consultee notes that the proposed cable corridor proximity to the Tongue Pilot Station necessitates consultation with Estuary Services and the Port of London Authority (PLA), who are likely to be most affected by any potential restrictions.</p>	
3.2.6	Application Document 6.3.4.7A-ES Appendix 4.7.A Navigational Risk Assessment [APP-203] N/A	<u>Overall route through the Sunk</u> <u>TSS Notifications to local ports and users</u>	<p>The Consultee advised National Grid to make sure the right notifications to local ports and users are issued and if there are unmanned vehicles, load lining exemptions will be needed to confirm communications between vessels. The Consultee noted that there is no ideal route through the area. The original plan was closer to the Sunk pilot station which the applicant has now moved North. This then puts the cable closer to the Sunk deep water anchorage, so it is a compromise. Once installed with the appropriate risk mitigation measures in place and secured in the DCO-DML, it should not have any detrimental effect on operations in the Sunk area. The challenges will be during the installation phase which is why a good NIP and VMP will be important.</p>	<p>In mitigation of such risks the Applicant intends to issue Notice to Mariners, and navigation warnings will be sent to a distribution list which will include Port and Harbour Authorities. This is noted in Application Document 6.3.4.7A-ES Appendix 4.7.A Navigational Risk Assessment [APP-203]</p> <p>The Applicant confirmed there are currently no plans to use unmanned vehicles at this stage. The Applicant noted that the route through the Sunk TSS appears a good approach given the various constraints. There is a compromise between locating as north as possible of the shipping channel and close to 90 degrees as possible.</p> <p>The Applicant welcomes acknowledgement of coordination and communication already undertaken among stakeholders.</p> <p>The Applicant agrees on the importance of a robust NIP. Regarding a VMP, please see the Applicant's position on item 3.2.3 above.</p>	Agreed
3.2.7	Application Document 9.12 Outline Navigation and Installation Plan [AS-104] Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7	<u>Communications during construction phase</u> <u>Overall route through the Sunk TSS</u>	<p>The Consultee requested notice to mariners to define what areas the marine survey vessels will be working in and on what days so the MCA can work with PLA and Harwich to manage other vessel traffic.</p> <p>The Consultee was asked if it had a preference for how to deal with notice and communication to mariners. The Consultee confirmed updates on a daily basis to help MCA plan movement would be helpful. noted that any cable through</p> <p>Given the complex traffic movements in the Sunk TSS will VTS area, applicant must provide clear intentions and</p>	<p>The Applicant noted that acknowledging the route through the Sunk TSS appears a good approach given the various constraints.</p> <p>There is a compromise between locating as north as possible of the shipping channel and close to 90 degrees as possible.</p> <p>The Applicant welcomes acknowledgement of coordination and maintaining effective communication already undertaken among relevant stakeholders. throughout the construction phase of the Sea Link Project. In response to requests for clear and timely updates during this period, the Applicant has incorporated communication protocols into its construction planning.</p>	Agreed Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
	Shipping and Navigation [REP1-059]		<p>communications from the installation vessel on a daily basis, and all coordination must be detailed in the VMP and the NIP.</p> <p><u>Construction and installation activities for Sea Link should not be coincident with those of navigation from vessels, but agrees it seems like a good option given the various constraints. the Five Estuaries and North Falls Offshore Windfarm projects (and other future projects) to avoid cumulative impacts and navigational risks.</u></p> <p><u>The MCA acknowledges and appreciates the applicant's efforts to revise the originally proposed cable route in response to consultation feedback. Given the complexity of SUNK area, there is no perfect routing solution. The revised route now passes north of the W1 buoy and south of the SUNK Deep Water Anchorage, increasing and decreasing proximity respectively. This highlights the critical importance of coordination and communication among all stakeholders. No activities involving vessels Restricted in Ability to Manoeuvre (RAM) should run concurrently with activities involving RAM vessels planned by the Five Estuaries and North Falls project developers in the SUNK area (or other future projects). This is mainly near the SUNK Pilot Boarding Ground (PBG).</u></p> <p><u>No project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility is below nautical 2 miles.</u></p>	<p>To support this commitment, a Navigation Installation Plan (NIP) is being developed following the submission of the Development Consent Order (DCO) application. The NIP will serve as a key mechanism for disseminating information to mariners and other stakeholders regarding navigational considerations during construction.</p> <p>A draft Outline NIP was submitted to the Planning Inspectorate (PINS) on 1 September 2025, as part of the Applicant's response to the Examining Authority's Section 89(3) letter dated 5 August 2025. Regarding a VMP, please see the Applicant's position on item 3.2.3 above.</p> <p>The Applicant notes the requirement to avoid RAM SIMOPS with the Five Estuaries and North Falls developments. The NIP (Application Document 9.12 Outline Navigation and Installation Plan [AS-104]) establishes the 'Concurrent Activity Area' within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments, as agreed with the ports stakeholders and in alignment with the North Falls and Five Estuaries oNIPs.</p> <p>The Applicant will aim to avoid RAM activities within the Sunk area when visibility is below 2 NM. This mitigation is captured within Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059].</p>	
3.2.8	N/A	New MCA Areas of Interest, Dec 2025 Communications during construction phase	<p>(11 May 2021) The Consultee requested a notice to mariners to define what areas the marine survey vessels will be working in and on what days so the MCA can work with PLA and Harwich to manage other vessel traffic. The MCA are just about to do the same with another project.</p> <p><u>–The Consultee has provided the applicant with MCA's area of interest (AOI) for safeguarded 22m water depth, and the AOI for concurrent RAM and Restricted Visibility Stop Ops.</u></p> <p><u>The Consultee was asked if it had a preference for how to deal with notice and communication to mariners. The Consultee confirmed updates on a daily basis to help MCA plan movement would be helpful. On other projects they have received written statements and taken part in daily update calls.</u></p>	<p>The Applicant acknowledged the importance of maintaining effective communication with relevant stakeholders throughout the construction phase of the Sea Link Project. In response to requests for clear and timely updates during this period, the Applicant has incorporated communication protocols into its construction planning.</p> <p>To support this commitment, a Navigation Installation Plan (NIP) is being developed following the submission of the Development Consent Order (DCO) application. The NIP will serve as a key mechanism for disseminating information to mariners and other stakeholders regarding navigational considerations during construction.</p> <p>A draft Outline NIP was submitted to the Planning Inspectorate (PINS) on 1 September 2025, as part of the Applicant's response to the Examining Authority's Section 89(3) letter dated 5 August 2025. The Consultee has sent the Applicant four additional areas of interest, as follows:</p> <p><u>An extended area of safeguarded depth to 22 m (with 0.5 m over-dredge) in the Sunk Pilot Boarding area, extending between KP 33 to KP 45. This is to include areas closer to the Sunk Deep Water Anchorage as well.</u></p>	Under discussion

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				<p><u>An extended area of avoiding concurrent RAM activities, from between KP 35 to Sunk Centre, to avoid SIMOPS with Five Estuaries and North Falls within the SUNK Outer Precautionary area where cable crossings are expected.</u></p> <p><u>The Restricted Visibility Stop Operation should be applied to the entire Sunk area KP 33 to KP 50.</u></p> <p><u>The MCA disagrees with the PLA and states that they believe 12.5 m safeguarding is not sufficient for the "Long Sand Head Two-Way Route Crossing area". The MCA establish an extended area including and beyond the Long Sand Head Two-Way Route Crossing area, within which the MCA will need more information and further consultation if there is any depth reduction, between KP 45 to KP85.</u></p> <p><u>The Applicant is seeking further clarity from the MCA on these new areas, which are substantially larger and more restrictive in their requirements than those which the Applicant and ports stakeholders have been collaborating on, and on which the Applicant and ports stakeholders have previously reached agreement. The Applicant will discuss this matter at a meeting with the MCA arranged on 16 January 2026.</u></p>	
3.2.9	N/A	Sunk deep water anchorage	The Consultee noted proximity to sunk deep water anchorage – there is potential that if a vessel dragged an anchor, they may damage the Sea Link cable.	The Applicant has considered this risk and will mitigate this risk as far as possible, through development of the Cable Burial Risk Assessment post submission. An initial draft has been submitted to PINS in October 2025.	Under discussion
3.2.10	N/A	Future project engagement	<p>Future project engagement at pre-application stage and on-going throughout the progress of the Proposed Project suggestions:</p> <p>The Consultee suggested that National Grid engage with the UK Harbour Masters Association (UKMA) SE coast committee.</p> <p>The Consultee suggested that National Grid engage with the Sunk VTS users' group (meet every 6 months).</p>	<p>The Applicant is considering the feasibility of updating stakeholders within these groups. The Applicant attended a Sunk User Group meeting to provide project update on 14th January 2025.</p> <p>The Applicant notes the importance of communication and commits to producing a Navigation Installation Plan (NIP) post-DCO submission, which will provide this mechanism for ensuring communication and collaboration with shipping and navigation stakeholders. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.</p>	Under discussion
3.2.11	<p>Application Document 7.5.3.1 CEMP Appendix A Outline 9.83 Code of Construction Practice IAPP</p>	Cable depth and other projects	<p><u>The Consultee confirmed the cable (and any covering material e.g. rock armour) must be at least 22 metres below Chart Datum in the vicinity of the Deep-Water (DW) Route and DW Anchorage to allow future vessels with a draught of 20 metres. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met and secured in the DCO.</u></p> <p>The Consultee confirmed through conversations with other projects and the PLA, they understand there may be plans to dredge (14-16 m), therefore any cable would have to be buried</p>	<p><u>The Applicant agrees in principle with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities (PLA, HHA and LGPL) and described in Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]. The Applicant is currently assessing the engineering implications of these requirements, specifically the additional cable Depth of Lowering (DoL) that may be necessary in parts of the "Sunk Pilot Boarding Area" where depths are already less than the 22 m CD safeguard level. The Applicant confirms that the assessment outlined in</u></p>	Under discussion

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	<p>341]submitted at Deadline 3</p> <p>Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]</p> <p>Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3</p>	<p>deeper. Other two projects have also got cable route through the inner precautionary area, which could result in a change in cable depth or possible rerouting of cable. Therefore, with robust vessel management plans in place it is possible to undertake cable activities in this area (precautionary area). The Consultee confirmed this would help make sure the route is clear for inbound and outbound details.</p>	<p>paragraph 2.3.9 of Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038] is ongoing, and an update on the outcome will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the agreed final Areas of Safeguarded Water Depth and associated requirements with all relevant stakeholders. The Applicant agrees with the port stakeholders that the aim is to secure these commitments through appropriate mechanisms, such as Protective Provisions and DCO provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording.</p> <p>The Applicant can confirm that it has been in discussion with the Port of London Authority and received the Area of Safeguarded Depth "Sunk Pilot Boarding area", where 22 m below Chart Datum is required to be preserved and to ensure that dredging in the relevant parts of the PLA's "Sunk Pilot Boarding area" can proceed to a depth of 22 m below CD. This area has also been agreed with Harwich Haven Authority and London Gateway Port. However, this agreed area does not include the immediate vicinity of the Sunk Deep Water Anchorage between KP 33 and KP 38, where depths are already shallower than the 22 m CD safeguard level and where the port authorities have confirmed there are no future plans to dredge to 22 m below Chart Datum. As discussed below the Applicant can confirm that proposed cable installation and protection methodology would preserve existing water depth within this region of the cable route.</p> <p>In the vicinity of the Sunk Deep Water Anchorage, the Applicant can confirm that the methodology for protecting the cable is by lowering the cable below the seabed to the proposed Target Depth of Lowering (TDOL) within a cable trench (2 m to 2.5 m) in accordance with the Applicants Cable Burial Risk Assessment (Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]). The trench along part of this high-risk section – specifically KP 38 to KP 58 – is proposed to be backfilled using rock to a level 20% below the original seabed level. There are no in-service or planned cable assets that cross the Offshore Scheme in the vicinity of the Sunk Deep Water Anchorage. The proposed cable installation and protection methodology would preserve existing water depth within this region of the cable route.</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>The Applicant noted that robust vessel management plans, as described in Application Document 7.5.3.1 CEMP Appendix A</p>		

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				<p>Outline 9.83 Code of Construction Practice [APP-341] submitted at Deadline 3, would be needed during cable installation activities. The Applicant is producing a Navigation Installation Plan (NIP) to provide this management and communication plan. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.</p>	
3.2.12	N/A	Navigation Installation Plan (NIP)	Full consultation on the Navigation Installation Plan (NIP) is essential. Given the complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital. The NIP must be discussed and agreed with the PLA, Harwich Haven Authority (HHA), Medway Port, and the MCA.	<p>The Applicant has submitted a draft Outline NIP to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. The Applicant will continue to engage with the key shipping and navigation stakeholders, including the Consultee, PLA, HHA and others to update and refine the Outline NIP through the pre-Examination and Examination phases.</p> <p>The Applicant wishes to keep the list of Interested Parties as streamlined as possible while including the key relevant stakeholders. The Applicant wishes to be able to update the NIP swiftly, as required, in order to get information out in a timely manner up to and throughout the construction phase. It therefore seeks to limit the list of Interested Parties to only those which overlap with our Areas of Interest, including other offshore developments which may be in construction at a similar timeline through the Sunk region, and those parties identified through consultation as expressing a need for enhanced communication through the consultation phase. Medway Port does not overlap with our NIP Areas of Interest, therefore has not been added as an Interested Party. National Grid most recently engaged with Medway in October 2025 who confirmed and agreed with this approach.</p>	Under discussion
3.2.13	Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [APP-080REP1-059]	Cumulative Impacts / Simultaneous Operations	Construction and installation activities for Sea Link should not coincide with those of the Five Estuaries and North Falls Offshore Windfarm projects to avoid cumulative impacts and navigational risks. The applicant must work with the relevant ports, VTS and offshore developers to coordinate activity and address this issue. Any simultaneous activities (including survey ops) with vessels on Restricted in Ability to Manoeuvre (RAM) status near the SUNK Pilot Boarding Ground (PBG), particularly to the east of the PBG should be avoided.	<p>The Applicant notes the Consultee's concerns regarding simultaneous operations. This matter is subject to further discussion and engagement between the Applicant and key shipping and navigation stakeholders which is ongoing, to reassure and find agreement on simultaneous operations.</p> <p>Additionally, the The Applicant notes the requirement to avoid RAM SIMOPS with the Five Estuaries and North Falls developments.</p> <p>The Applicant is producing a communication protocol in the form of an NIP to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key Project phases, in particular the construction phase. This is noted in Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [APP-080REP1-059]. 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</p>	Under discussion

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				<p>has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025.</p>	
3.2.14	Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-064]	Future Vessel Draught Considerations	<p>With vessels potentially reaching draughts of up to 20 m, Harwich Haven Authority (HHA) recommends that the cable and any protective materials (e.g., rock armour) to be a minimum of 22 m below Chart Datum. The MCA fully supports this recommendation to future-proof navigational safety.</p>	<p>Concerns surrounding under-keel clearance are noted and addressed in the Section 7.6 of Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [APP-203], in Section 7.6. REP1-064.</p> <p>In line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5 % along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a very small number of locations, which are anticipated to be located close into shore. Any anticipated areas where reductions in water depth may be greater than 5 % will be discussed with relevant stakeholders including port and harbour authorities.</p> <p>The request for preserving a minimum water depth of 22 m below chart datum has been discussed with Harwich Haven Authority, and it has been established that this request applies specifically to "the Sunk Area" as defined as the area bounded by the following: North of the Storm Buoy, and NW of the Whiskey 1 Buoy, and East of the Shipwash.</p> <p>The Applicant is working with Harwich Haven Authority (HHA) and other key shipping and navigation stakeholders to reassure and find agreement on water depth concerns. This matter is subject to further discussion and engagement between the Applicant and HHA, including specifics on the geographical extent of "the Sunk Area" defined by HHA. The Applicant is arranging a further meeting with HHA in order to discuss this and find agreement. Regarding the requirement to preserve 22 m below chart datum, please see item 3.2.11 above.</p>	Under discussion
3.2.15	Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]	Electromagnetic deviation	<p>The MCA has reviewed the Electric and Magnetic Field Compliance Report for the Sea Link HVDC cable. We confirm that the offshore section complies with our requirements; less than 3° deviation for 95% of the route and less than 5° for the remaining 5%, as detailed in Table 5.2 of the report.</p> <p>In nearshore areas where the cables are separated by 45m and buried to a depth of 10m (approximately 2.435 km in total—1.524 km along the Suffolk coast and 0.911 km in Pegwell Bay), no detailed electromagnetic field (EMF) assessment has been provided. While this segment represents only 2 % of the total route and vessel traffic is mostly perpendicular (minimising</p>	<p>The Applicant notes the Consultee's request that the maximum burial depth be used throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation.</p> <p>The Applicant notes the Consultee's request that should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-</p>	Under discussion

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	Application Document 6.2.1.4 Description of the Proposed Project [AS-093]		<p>interaction), the separation may result in compass deviations exceeding 5°.</p> <p>Although the navigational impact is expected to be minimal, the MCA requests that the project team ensure maximum burial depth throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation. Should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.</p>	<p>construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.</p> <p>The Applicant confirms an initial high-level assessment has been undertaken in response to this comment in the MCA Relevant Representation and are confident they can meet the Consultee's requirements in this area. A full update to the EMF report will be carried out once a full analysis update had been carried out pre-construction and will be shared with the Consultee at the earliest opportunity.</p>	

4. Approvals

Signed

On Behalf of National Grid

Name

Position

Date

Signed

On Behalf of Maritime and Coastguard Agency

Name

Position

Date

5. References

Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com