

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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Version

Date	Version	Status	Description / Changes
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1
January 2026	C	DRAFT	Issued to PINS for Deadline 3

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 examination period 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
HHA	Harwich Haven Authority
LGPL	London Gateway Port Limited
MCA	Maritime and Coastguard Agency
NIP	Navigation Installation Plan
NRA	Navigation Risk Assessment
PLA	Port of London Authority
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>	<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> <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>
07 June 2021	<i>The Applicant, PLA, MCA, Arup, Aecom, 4C Offshore Ltd - Routeing meeting</i>	<i>Introductions and objectives, route update – PLA confirmed new route is better than previous, questions and AOB.</i> <i>Actions: The Applicant to consult MCA and PLA on Vessel Management Plan and the Applicant to confirm final marine route.</i>
04 July 2022	Surveys	<i>Additional marine survey</i>
05 August 2022	<i>The Applicant, Aecom, PLA, Red Penguin – Routeing Meeting</i>	<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> <i>Actions: PLA to email Sea Link documents that outline future plans for PLA (including any future dredging plans).</i>
28 April 2023	<i>Shipping and navigation consultation meeting and Hazard workshop</i>	<i>Consultation 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	PEIR	<i>PLA response to statutory consultation</i>

Date	Topic	Discussion points
July-August 2024	Survey	<i>Notification of Survey</i>
August 2024	Further consultation	<i>PLA response to consultation</i>

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	<i>PLA comments on SoCG document</i>
23 June 2025	PLA Relevant Representation	<i>Permanent and temporary impacts associated with water depth and under-keel clearance to ensure current and future port access, cable crossings, cable lay approach, simultaneous operations, dredging. Surveys and activities.</i>
26 June 2025	Teams meeting on SoCG	<i>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.</i>
01 August 2025	GIS shapefile data from PLA shared with the Applicant, defining Area's of Safeguarded Depth	<i>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.</i>
17 October 2025	Teams meeting on Protective Provisions	<i>Discussion points including the PLA's three Areas of Safeguarded Depth, GridLink crossing, Protective Provisions wording.</i>
05 November 2025	Teams meeting on Protective Provisions	<i>Comments on draft Protective Provisions received from PLA for review</i>

Date	Topic	Discussion points
19 November 2025	<i>Teams meeting with PLA, Harwich Haven Authority (HHA) and London Gateway Port Limited (LGPL) and Applicant</i>	<i>Monthly Meeting - Clarification on ports requirements and areas of interest</i>
19 December 2025	<i>Teams meeting with PLA, HHA and LGPL and Applicant</i>	<i>Monthly Meeting - Clarification on ports requirements and areas of interest</i>

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
3.1.1	<p>Application Document 6.3.4.7.A ES Appendix Navigational Risk Assessment [REP1-063]</p> <p>Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]</p>	<p>Permanent impacts because of cable depths</p> <p>Consensus from the Port of London, Tilbury, London Gateway and Harwich is that access via the Sunk needs to be safeguarded for vessels of 20m draft, and accounting for 10% under keel clearance that means that -22 m below CD needs to be safeguarded. Five Estuaries and North Falls windfarms have already agreed this is realistic future scenario and are designing their scheme accordingly.</p> <p>The Consullee also requires 12.5m below CD to be safeguarded for the southern access to the port at the North East Spit and Long Sand head 2</p>	<p>The Consullee expressed concerns surrounding any reduction in water depth affecting current or future navigation in the port approaches, pilot boarding/landing areas and in the Long Sand Head two way route.</p> <p>The proposed marine route is running close to the Northeast Spit and Sunk pilot boarding and landing areas and there must be no impact on the current and future pilotage operations. The area of boarding and landing is not limited to the diamond but takes place depending on weather and other traffic.</p>	<p>Impacts of potential reduction in water depth is discussed in Application Document 6.3.4.7.A (B) ES Appendix Navigational Risk Assessment [REP1-063].</p> <p>The Applicant has provided the latest Order Limits to the Consullee (in July 2022 and again in December 2024). 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 acknowledges the Consullee'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 Consullee to provide assurance on this matter and provide greater clarity. The Applicant has established a monthly shipping and navigation stakeholder meeting with the key ports and the MCA, including the PLA, with meetings taking place in November 2025 and December 2025.</p> <p>The Applicant understands the Consullee's position on facilitating current and future access to and from the port and has received the Consullee'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 Consullee to understand areas where the</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	PLA Current Position	The Applicant's Current Position	Status
			<p>way route (see also 3.1.7 Routeing below).</p> <p>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>Solely considering relative percentage reductions in existing depths is not appropriate.</p>	<p>Consultee wishes to safeguard water depth 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 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 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 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 final Areas of Safeguarded Water Depth and associated requirements agreed 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>	
3.1.2	Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	<p>Permanent impacts from interaction with third party schemes - cable crossings</p>	<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>Potential cable crossings are set out in the Environmental Statement. 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>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	PLA Current Position	The Applicant's Current Position	Status
			<p>At cable crossings, one cable will need to be buried deeper in order to allow the second cable to be placed 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 seabed. Crossings involve the placing of rock protection on the seabed 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 pilot boarding and landing areas to avoid disruption to this crucial service when laying or maintaining the cable.</p> <p>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</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>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> <p>A technical note was supplied (Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]) which</p>	

Ref	Relevant Application Document	Summary of Description of Matter	PLA Current Position	The Applicant's Current Position	Status
			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.	provided further detail on cable crossings and potential impacts on under-keel clearance.	
3.1.3	Application Document 9.12 Outline Navigation and Installation Plan [AS-104]	Temporary impacts from cable laying and repair - 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>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>It would be useful to have communication of when the works will happen and where (how long and which section).</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. The Applicant will submit an updated version of Application Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4.</p> <p>The Applicant attended a Sunk User Group meeting to provide project update on 14th January 2025. The Applicant has also established a monthly shipping and navigation stakeholder remote meeting with the key ports and the MCA, including Sunk User Group representatives, with meetings taking place in November 2025 and December 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
3.1.4	N/A	Temporary impacts from cable laying and repair - 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</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	PLA Current Position	The Applicant's Current Position	Status
				<p>attendance at the 7 June 2021 meeting with the MCA and PLA, and the 4 July 2022 meeting with the MCA and PLA. Additionally in December 2025 a review of the invitee list was undertaken for the monthly Shipping and Navigational Stakeholder Meeting hosted online by the Applicant. This invite has now been shared with the relevant individuals for the Sunk VTS.</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>	
3.1.5	N/A	Pre- Application Consultation	<p>The Consultee provided constructive feedback to the Applicants early routing proposals. The proposed cable route should be the shortest route across the Long Sand Head two-way route.</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>	Agreed
3.1.6	Application Document 9.12 Outline Navigation and Installation Plan [AS-104]	<p>Pre Application Consultation - Routing in 2023 (response to PEIR)</p>	<p>The Consultee provided constructive feedback to the Applicants early routing proposals.</p>	<ul style="list-style-type: none"> The Applicant has noted the constructive feedback provided by the PLA, and has worked to provide further detail on matters including: 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. 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 	Under discussion

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				<p>provide increased headroom at the expected location of the crossing with GridLink.</p> <ul style="list-style-type: none"> 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. 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. 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. The Applicant will submit an updated version of Application Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4. The Applicant has provided the latest Order Limits to the Consultee (in July 2022 and again in December 2024). Regarding Deep Water Routes, the Applicant can confirm that unlike the Five Estuaries and North Falls projects, the Sea Link 	

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				cable route will not interact with the deep water routes 'Sunk deep water route' or 'Trinity deep water route'.	
3.1.7	N/A	Pre- Application Consultation 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	Application Document 9.12 Outline Navigation and Installation Plan [AS-104] Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038] Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]	Permanent impacts because of cable depths - approach to cable laying	<p>In relation to cable laying where the proposed route goes within or close to the Areas of Interest , the Consultee expects the cable to be laid using the quickest method to achieve the required burial installation levels.</p> <p>Construction and maintenance vessels must not hinder access or egress into/out of the Port nor the ability to board or land pilots.</p>	<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. The Applicant will submit an updated version of Application</p>	Under discussion

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			<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>Where burial depth cannot be achieved, reductions in water depth would not be appropriate within the Sunk (KP38 to 58) or the Northeast Spit (KP 81.5 and 96.5).</p>	<p>Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4.</p> <p>The installation will be undertaken utilising Dynamic Positioning 2 cable installation vessel (it is only envisaged that a barge will 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 planned 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 has committed in the PEIR and Environmental Statement to not overtop the seabed.</p> <p>A technical note was supplied (Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]) which provided 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".</p> <p>This Technical Note included 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.</p> <p>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</p>	

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				<p>Technical Note also details 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 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 Table 4.15 of Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. 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 Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003] 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</p>	

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			<p>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 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>		

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3.1.9	N/A	Order Limits	<p>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.</p>	<p>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.</p> <p>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.</p>	Under discussion
3.1.10	N/A	Mitigating potential impacts to shipping and navigation - burial depth	<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>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 (sediment areas) a depth of lowering of between 1.0 m to 2.5 m has been specified.</p> <p>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>	Under discussion
3.1.11	N/A	Pre Application Consultation	<p>The Consultee has repeatedly strongly urged the Applicant to engage with the Consultee</p>	<p>See Table 2.1 for a summary of engagement.</p> <p>As noted above, the Applicant has established a monthly shipping and navigation stakeholder remote meeting with the key ports and the MCA, including the PLA, with meetings taking place in November 2025 and December 2025, with the intention to continue these regular meetings throughout the DCO Examination process, with additional meetings as required.</p>	Agreed

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3.1.12	N/A	Pre Application 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	Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063]	Permanent impacts because of cable depths - anchorages	Depths in the vicinity of the Tongue deep water and hazardous anchorages must be preserved so as not to compromise the ability of deep draughted vessels to enter and exit the anchorages	Nearby navigational features including anchorages are identified in Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063] . This highlighted concern is noted by the Applicant.	Under discussion
3.1.14	Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063] Application Document 9.12 Outline Navigation and Installation Plan [AS-104]	Temporary and permanent impacts from pre-construction surveys and activities and post construction surveys	<p>The Consultee needs to be consulted on any surveys or monitoring that could affect the Consultee's area of interest as the activities may hinder vessel access to the Port. These activities should be considered in the outline Navigation Installation Plan.</p> <p>Cable route clearance activities (including boulder/debris clearance, UXO, sandwave lowering, wet storage, archaeological find relocation) have the potential for permanent and temporary impacts. The Consultee would expect the Applicant to produce an outline Cable Specification and Installation Plan with specific commitments to mitigate these issues.</p>	<p>Potential impacts to shipping and navigation are discussed in Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063].</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</p>	Under discussion

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				of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. The Applicant will submit an updated version of Application Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4.	
3.1.15	Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059] Application Document 9.12 Outline Navigation and Installation Plan [AS-104]	Temporary impacts from interaction with third party schemes - simultaneous operations	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. The Consultee expects the Applicant to address this in the outline Navigation Installation Plan.	<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 Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]. 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 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. The Applicant will submit an updated version of Application Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4.</p>	Under discussion
3.1.16	N/A	Mitigating potential impacts to shipping and navigation - dredging	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	The Applicant notes this position, and discussions with the Consultee are ongoing on the scope of the Outline Sediment Disposal Management Plan (OSDMP).	Under discussion
				This OSDMP will be submitted as part of the Outline Cable Specification and Installation Plan (CSIP) at Deadline 4.	

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3.1.17	N/A	Mitigating potential impacts to shipping and navigation - minimum seabed depths plan	<p>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>	<p>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 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.</p>	<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.</p> <p>The Applicant is working with the Consultee to 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.</p>	Under discussion
3.1.18	N/A	Temporary impacts from cable laying and repair - 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	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	Agreed	

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			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.	liaise with Trinity House in the eventuality that they are considered.	
3.1.19	Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059] Application Document 9.12 Outline Navigation and Installation Plan [AS-104]	Mitigating potential impacts to shipping and navigation - 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.	<p>The Applicant has submitted a first draft of proposed Protective Provision wording for the DCO to the Consullee, 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 Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]. 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. The Applicant will submit an updated version of Application Document 9.12 Outline Navigation and Installation Plan [AS-104] at Deadline 4.</p> <p>The location of planned wet storage areas if required will be confirmed in advance to prevent impact the three Areas of Safeguarded Depth, as defined by the Port of London Authority as being the “Sunk Pilot Boarding area”, “Long Sand Head Two-Way Route crossing area” and “North East Spit area”.</p>	Under discussion

3.2 Environmental Matters

Table 3.2 Environmental Matters

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3.2.1	Application Document 6.6 (E) Environmental Information Habitats Regulations Assessment Report submitted at Deadline 3.	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.	Application Document 6.6 (D) Environmental Information Habitats Regulations Assessment Report [APP-290] was submitted as part of the DCO application. An update has been made to this report Application Document 6.6 (E) Environmental Information Habitats Regulations Assessment Report submitted at Deadline 3.	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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