

Examining Authority’s Issue Specific Hearing 2 (ISH2) Wednesday 28 to Friday 30 January 2026 Supplementary agenda additional questions

In response to the Examination Authority’s supplementary agenda additional questions issued on 16 January 2025, the Maritime and Coastguard Agency would like to comment as follows at Deadline 4, Tuesday 10 February 2026.

Number	Subject	Question to:	Question/Clarification	Response from MCA
Shipping and Navigation				
ISH2.029.	Concurrent restricted ability to manoeuvre (RAM) operations in the Sunk	Applicant and relevant stakeholders	Is SN12 of REAC [REP3-078] sufficiently effective as a commitment to avoid concurrent RAM operations with other projects in the Sunk area, or do concurrent RAM operations need to be precluded through the dDCO/ Deemed Marine Licence (DML). If so, provide suggested wording for the inclusion of such a provision in the dDCO/ DML.	<p>It is the MCA’s position that SN12 of REAC [REP3-078] is <u>not</u> sufficiently effective as a commitment to avoid concurrent RAM operations with other projects in the Sunk area.</p> <p>As the National Competent Authority for the SUNK Vessel Traffic Services (VTS), the MCA requests that our defined area of interest (figure 1 below) for Sea Link to commit to no concurrent activities with other projects <u>and</u> for Sea Link to cease operations in visibility of less than 2nm, is secured in the DCO DML as this is a key risk mitigation measure to preserve the safety of navigation in the SUNK area.</p> <p>The REAC is a list of commitments, although secured in the DCO, and SN12 states “<i>Restricted Ability to Manoeuvre operations in the Sunk area will be avoided where practicable in visibilities of below 2 nautical miles</i>”.</p> <p>‘Where practicable’ is very vague and this commitment <u>only</u> refers to RAM activities during reduced visibility. For the MCA’s defined area of interest in figure 1, we would like to ensure:</p>

				<p>1) No Sea Link project activities involving vessels Restricted in Ability to Manoeuvre (RAM) to operate concurrently with activities involving RAM vessels planned by the Five Estuaries and North Falls offshore windfarm project in the SUNK area (or other future projects), within the MCA defined area bound by the following coordinates:</p> <table border="1" data-bbox="1406 499 1966 676"> <thead> <tr> <th>ID</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>51° 53.0032' N</td> <td>001° 38.2325' E</td> </tr> <tr> <td>B</td> <td>51° 53.0032' N</td> <td>001° 47.2371' E</td> </tr> <tr> <td>C</td> <td>51° 48.0528' N</td> <td>001° 47.2371' E</td> </tr> <tr> <td>D</td> <td>51° 48.0528' N</td> <td>001° 38.2325' E</td> </tr> </tbody> </table> <p>And</p> <p>2) No Sea Link project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey) are to operate when visibility is below 2 nautical miles within the MCA's defined area in figure 1.</p> <p>S12 of the REAC does not currently secure both aspects sufficiently.</p> <p>The MCA's justification for our defined area of interest is as follows:</p> <p>1) The defined area of interest in figure 1 is a relatively small area of navigable sea room considering the size and draft of the vessels involved. Pilot boarding/dis-embarking is an 'area' and not a specific point. Vessels are usually requested to come to a position 1NM</p>	ID	Latitude	Longitude	A	51° 53.0032' N	001° 38.2325' E	B	51° 53.0032' N	001° 47.2371' E	C	51° 48.0528' N	001° 47.2371' E	D	51° 48.0528' N	001° 38.2325' E
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				<p>to the east of the pilot boarding area or 1.5 northeast for the ultra-large vessels. The vessels are then given a heading to board which could be any heading based on the weather / sea conditions. As such, vessels are boarded anywhere to the east of a line drawn North-South through the pilot diamond, including in the anchorages. The same applies to vessels disembarking a pilot which could be anywhere in (or close) to one of the Deep-Water Routes in the Sunk Inner.</p> <p>2) Additionally, the MCA is requesting a larger defined area of interest figure 1 than was previously permitted for the North Falls and Five Estuaries projects. When those projects were approved, both were located to the south of the area, which still left a small section of navigable sea room to the north for other activities. However, the Sea Link project now occupies the northern part of the area significantly reducing the remaining safe sea room and further limiting the ability to conduct marine operations or transits to and from PLA and HHA.</p> <p>3) This is further compounded as almost all vessels exit the Sunk Inner to the Southeast to follow the IMO routing measure in the Strait of Dover which is considered as one of the busiest and most complex shipping lanes in the world. If all three project operations were taking place at the same time, the southeast corridor would be reduced to less than 1NM wide.</p>
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				<p>4) Also, a recent trend is that, due to the northward migration of the Long Sand bank (within the SUNK area), the larger vessels using the Long Sand Head two-way route increasingly tend to divert into the Sunk Inner (north of the magenta line marking the northern limit of the LSH route), to maintain safe navigable depth. This behaviour further reduces available sea room particularly when vessels are simultaneously outbound from the PLA or HHA and can therefore create additional navigational constraints. This can be seen in Figure 2 attached below, sourced from applicants' submission APP- 284- Fig. 6.4.4.7.4.14.</p> <p>5) A further complication is that, during the summer months, numerous sailing vessels often cut directly across the area on a straight southeast course from Harwich. This reduces available sea room and is made more challenging by the fact that many of these pleasure craft have low-power radios and only carry Category B AIS transponders, making it difficult or sometimes impossible for VTS to detect or communicate with them.</p> <p>Similar issues arise with fishing vessels, which often switch off their AIS to avoid revealing their location to other fishermen. These factors further constrain the already limited safe sea room, both before and after a vessel has a pilot on board. This risk should not be underestimated, as the operators of</p>
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				<p>such vessels are frequently unaware of, or do not fully adhere to, the Collision Regulations, including the requirement not to impede deep draft vessels in designated deepwater routes.</p> <p>In summary, the MCA is seeking this defined area of interest in figure 1 to account for a credible worst-case scenario, namely, multiple RAM operations taking place within an already constrained sea room, potentially in restricted visibility, and in proximity to some of the largest vessels operating worldwide. An incident involving an ultra-large vessel, such as one comparable to the <i>Ever Given</i>, would have significant safety implications, attract global media attention, and could adversely affect the UK economy. The proposed restriction is therefore both proportionate and essential to ensuring the Safety of Navigation.</p>
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The Maritime and Coastguard Agency's defined Area of Interest

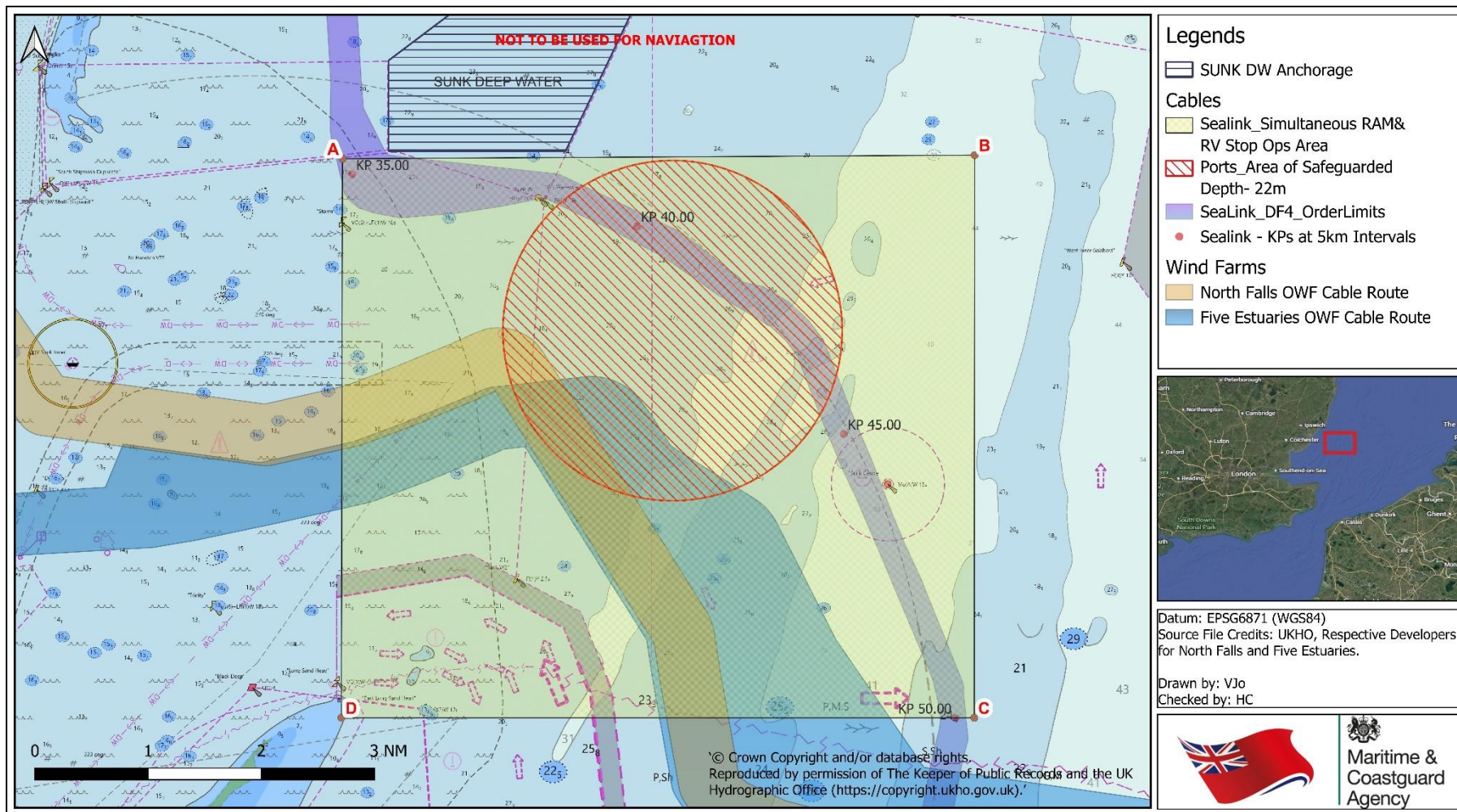


Fig.1- MCA RAM & Restricted Visibility Stop SimOps Area

Navigational Constraints - Traffic Pattern of Large Vessels

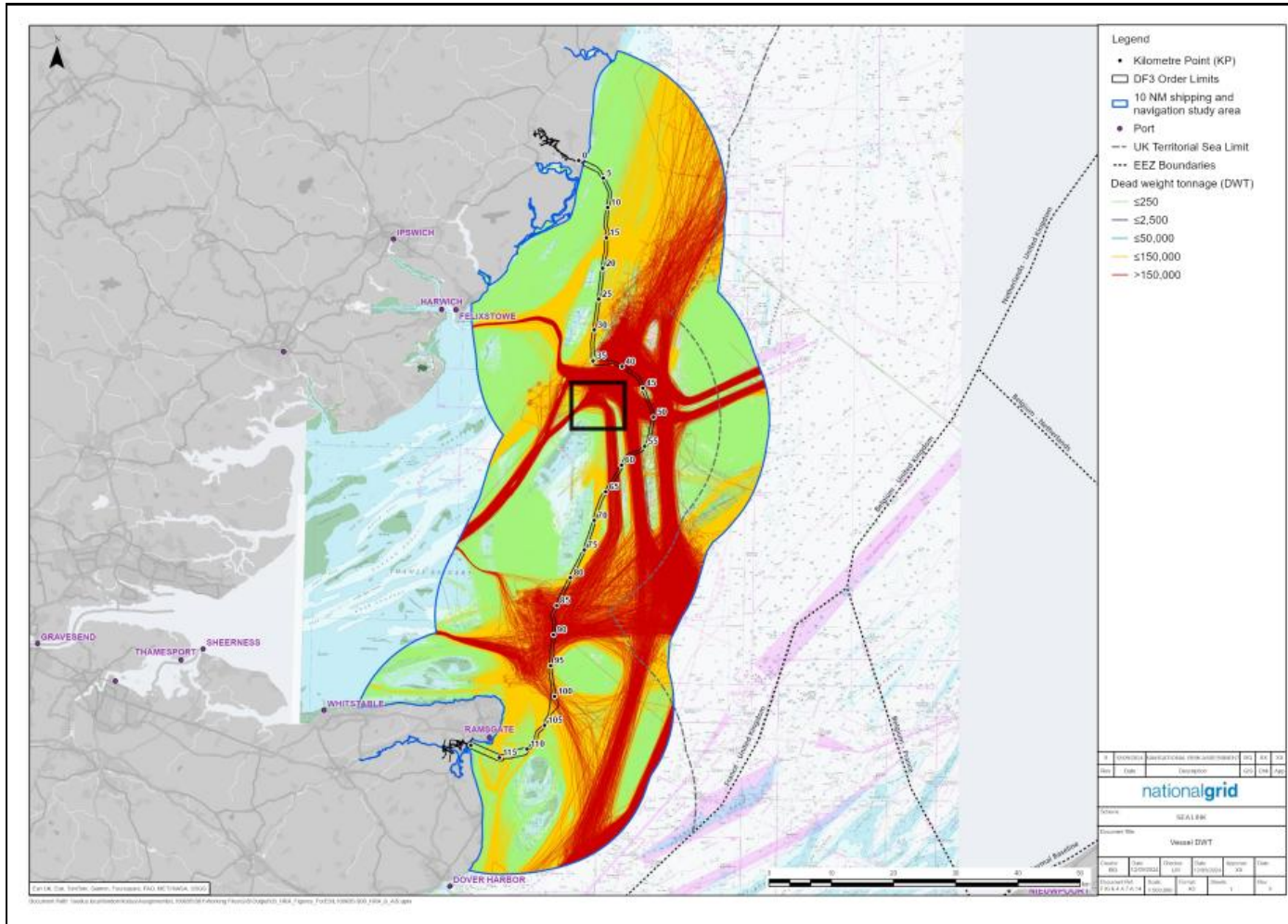


Fig.2- Traffic Pattern of large vessels (within the black box) in Long Sand Heads two-way route (ref: Fig. 6.4.4.7.4.14 (APP- 284))