

**THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010**

**APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION  
FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE SEA LINK PROJECT  
(REF: EN020026)**

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**DEADLINE 4 ORAL REPRESENTATIONS MADE  
ON BEHALF OF THE PORT OF LONDON  
AUTHORITY AT ISH2**

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## INTRODUCTION

This is a written submission made on behalf of the Port of London Authority (“PLA”) in respect of oral submissions made at Issue Specific Hearing 2 on Thursday 29 and Friday 30 January 2026. The PLA's response to the supplementary agenda additional questions for Issue Specific Hearing 2 appear in a separate document. The purpose of this document is to provide a written record of the representations made orally to specific questions and needs to be read with the PLA's Deadline 3 and 4 submissions.

<b>Issue Specific Hearing 2</b>	
<b>Agenda Item</b>	<b>Oral Submission made on behalf of the Port of London Authority</b>
<p><b>Shipping and Navigation</b></p> <p>19.1 Safeguarding of dredging depths</p>	<p>The ExA noted that the PLA had suggested a certified plan for future dredging depths and a DCO requirement and the Applicant indicated that its current position is to secure this through protective provisions as this enabled the Applicant to agree the ability to derogate from a fixed position with use of language such as "unless otherwise agreed".</p> <p>Representations were made on behalf of the PLA, that the reference to the ability to derogate from the safeguarded depths highlighted the need for a Design Requirement. The Areas of Interest affect multiple parties and it would not be acceptable to have different requirements in different protective provisions. This is a key issue for the ports and the MCA, and it really must be a Design Requirement.</p> <p>In terms of the protective provisions that have been offered to the Port of London, these are not yet agreed and suggest that the safeguarded depths will be a matter for the CSIP. The Applicant also has the ability to derogate from the requirements in the CSIP with the MMO's approval.</p>
<p>19.2 Cable exposure during operation</p>	<p>It was explained on behalf of the PLA that there are risks of cable exposure during the lifetime of the cable. Seabed levels do change overtime and in the Areas of Interest the PLA is interested in absolute depths. If properly installed the position of the cable shouldn't move relative to the level of the water. If the seabed erodes and the cable becomes exposed the Applicant will naturally want to do something to address that exposure.</p> <p>The Requirement sought by the PLA requires the authorised development and ancillary works to be maintained such that the safeguarded dredged depths apply within the Areas of Interest. which would address this as well as a requirement for remediation.</p>

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19.4 Cable Crossings	<p>The ExA noted that the Deadline 3 documents submitted by the Applicant make reference to moving the HVDC cable into deeper water to accommodate a future crossing with GridLink and the ExA sought clarity on how that would be secured. The Applicant indicated that it would take that question away for further consideration.</p> <p>Representations on behalf of the PLA put forward a suggestion that the certified plan linked to the Requirement and Areas of Interest for the safeguarding of dredging depths could include demarcation of the less deep areas where the Sea Link cable would not be laid.</p> <p>The important point for the PLA is that, if the Sea Link cable is laid first that could in fact prohibit the GridLink cable proposal coming forward, unless the laying of the Sea Link cable is limited to a location within deeper waters. The PLA would wish to see this matter at least covered through the Design Requirement.</p>
19.8 Cable burial risk assessment	<p>In response to ExAQ1 question ISN7 the PLA had noted that following the submission of the Integrated Geophysical and Geotechnical Report [REP2-035], it should be clarified whether the additional information has any material impact on the Cable Burial Risk Assessment ("CBRA")</p> <p>Representations were made by the Applicant that it did not believe that the additional information would have a material impact on the CBRA. The PLA indicated and can confirm that it has no further representations in response to the Applicant's comments.</p>
<p><b>Development Consent Order:</b></p> <p>21.3 - Schedule 3 Requirement 6, the submission and approval of plans.</p>	<p>Schedule 3, Requirement 6 – includes a requirement for the Register of Environmental Actions and Commitments ("REAC") to be submitted to and approved by the relevant planning authority or other discharging authority. In relation to the REAC which contains both onshore and offshore commitments it is unclear who would approve the REAC. The offshore commitments should be for the MMO and that may get addressed through shipping and navigational commitments being secured through the Navigational Installation Plan ("NIP").</p> <p>The PLA is relying on commitments which are set out in the REAC and the PLA note the Applicant's acknowledgment that the final REAC should be "in general accordance with the draft REAC". The PLA would be concerned with the shipping and navigation commitments being watered down.</p>

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	<p>The shipping and navigation commitments in the REAC need to be reviewed generally as the shipping and navigation commitments in the REAC are said to be secured through Requirement 6 and the Offshore Construction and Environment Management Plan. The Offshore Construction and Environment Management Plan is not listed in Requirement 6 but is in fact secured through the Deemed Marine Licence. The PLA would expect Shipping and Navigation commitments to be secured through the NIP and CSIP.</p>