

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)**

**DEADLINE 4: PORT OF LONDON
AUTHORITY'S REPLIES TO SUPPLEMENTARY
AGENDA ADDITIONAL QUESTIONS**

1 INTRODUCTION

1.1 Below is Port of London Authority's ("PLA") response to the Supplementary Agenda Additional Questions issued for Issue Specific Hearing 2.

Number	Subject	Response by	Question/Clarification	Response on behalf of the Port of London Authority
ISH2.02.	National Policy Statements	Applicant, local authorities and IPs	<p>The following National Policy Statements (NPS) were designated on 6 January 2026: EN-1, EN-3, EN-5. Considering paragraph 1.6.3 of EN-1 (2026) whilst the revised NPS's will only have effect in relation to those applications for development consent accepted for examination after 6 January 2026 they are capable of being important and relevant considerations in the decision-making process for this application.</p> <p>Local authorities and interested parties: Submit any comments in relation to any implications of the newly designated NPSs for the examination of this application.</p>	<p>Section 4 of the PLA's Written Representation [REP1 – 156] deals with the National Policy Statement for Energy (EN-1) (January 2024) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) (January 2024). Within that section the PLA refers to various paragraphs within those NPSs that reference navigation and shipping.</p> <p>The PLA note that those paragraphs referenced and reproduced in the PLA's Written Representation remain in the versions designated on 6 January 2026. The paragraph numbers have just changed as per the below:</p> <p><u>EN1</u></p> <ul style="list-style-type: none"> • Paragraph 4.1.7 remains the same • Paragraph 4.2.15 now appears in 4.2.28 <p><u>EN3</u></p> <ul style="list-style-type: none"> • Paragraph 2.8.328 now appears in 2.8.295 • Paragraph 2.8.329 now appears in 2.8.296 • Paragraph 2.8.331 now appears in 2.8.298 • Paragraph 2.8.335 now appears in 2.8.302 <p>The updated Energy NPSs do not alter, therefore, the national policy considerations relevant to shipping and navigation.</p>
Shipping and Navigation				
ISH2.030.	Concurrent restricted ability to manoeuvre (RAM) operations in the Sunk	Applicant/relevant stakeholders	<p>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 wording for the inclusion of such a provision in the dDCO/ DML.</p>	<p>SN11 refers to "coordination of planned operations within the Sunk region, to avoid concurrent Restricted Ability to Manoeuvre (RAM) operations (such as cable lay and burial) with other projects in the Sunk area <u>where possible</u>, in particular regarding the North Falls and Five Estuaries Wind Farm projects" (emphasis added).</p> <p>SN12 states that "Restricted Ability to Manoeuvre operations in the Sunk area will be avoided <u>where practicable</u> in visibilities of below 2 nautical miles." (emphasis added)</p> <p>The purpose of the REAC is to record commitments made by the Applicant including embedded measures, good practice measures and additional mitigation measures. It does not in fact secure any commitments but will assist the applicant and their contractor in achieving compliance. The PLA considers, therefore, that the Navigation Installation Plan ("NIP") would be the appropriate securing</p>

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				<p>mechanism for commitments relating to RAM operations and that the REAC should identify the NIP as the securing mechanism. The current wording in SN11 and SN12 also needs to be updated to provide a clear commitment (secured through the NIP) and apply to all three Areas of Interest and state as follows:</p> <p>"SN11 Coordination of planned operations within the Areas of Interest, so that there are at no time concurrent Restricted Ability to Manoeuvre (RAM) operations (such as cable lay and burial) with other projects in the Areas of Interest, including the North Falls and Five Estuaries Wind Farm projects".</p> <p>"SN12 Restricted Ability to Manoeuvre operations in the Areas of Interest will be avoided in visibilities of below 2 nautical miles."</p>
ISH2.031.	Interaction with Gridlink cables	Applicant	In the response to the ExA's first written question 1OSU2 [REP3-069], it is stated that the proposed cable route would be moved into deeper waters to the east within the order limits. Provide an explanation of how this routing would be effectively secured.	Whilst this question is directed to the Applicant, the PLA set out in its deadline 3 responses suggested wording for a Requirement to address the issue of Gridlink and Sea Link crossing. The wording suggested by the PLA would ensure that the required depth is maintained regardless of whether Gridlink or Sea Link is installed first. See para 2.3 of REP3-121 and the PLA's response to ISN3 in REP3-096.
The draft Development Consent Order				
ISH2.037.	SH2.037. Schedule 16 DML Part 2 Condition 4 Pre-construction plans and documentation paragraph 4.(1)	Marine Management Organisation (MMO) and any other relevant stakeholders	In response to ExA question 1GEN16 the applicant amended the wording in Schedule 16 DML Part 2 Condition 4 Pre Construction Plans and Documentation paragraph 4(1) to include the words "in general accordance with" [REP3-006]. Provide comments as to whether the wording is satisfactory, or suggest alternative wording.	<p>In relation to Schedule 16 DML Part 2 Condition 4 the PLA would want to see the drafting updated for the Cable Specification and Installation Plan ("CSIP") and the NIP so that these plans must be in accordance with the principles in the relevant outline plans.</p> <p>The PLA note the Applicant's response to the Examining Authority's Written Question 1GEN61 where they state they will amend the wording of Schedule 16 Part 2 Condition 4 to expressly require that the pre-construction plans and documents to be <u>substantially</u> in accordance with the principles set out in the outline version (emphasis added). In the PLA's opinion substantial accordance provides too much scope for the Applicant to depart from the principles that have been consulted upon during the examination process and result in a final plan that materially differs from that submitted in outline form during the examination.</p>
ISH2.038.	Schedule 16 DML – Part 2 condition 4	MMO	In response to ExA question 1GEN58 the MMO has stated it does not agree with the wording of this condition [REP3-094]. Please submit suggested alternative drafting.	<p>Whilst this question is directed at the MMO the PLA would note that it has also sought revisions to this condition and as set out in its Deadline 4 submissions which includes a mark-up of the DML:</p> <ul style="list-style-type: none"> • Part 2 Condition 4 sub-paragraph (1) naming the PLA as a consultee on the pre-construction plans and documentation • Part 2 Condition 4 sub-paragraph (1) (a) (b) and (g) requires the CSIP, offshore CEMP and NIP to be "<i>in general accordance with the principles</i>" of their respective outline plans. The PLA has concerns about this wording which is very weak and could result in final plans being substantially different from the outline plans. The PLA considers that the final plans need to be in accordance with the principle of the outline plans. • Part 2 Condition 4 sub-paragraph (5) needs to be amended to require the MMO to consult where a licensed activity is permitted to be carried out without complying with an approved plan.

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				<ul style="list-style-type: none"> • Part 2 Condition 4 sub-paragraph (6) now includes reference to not reducing water depth by more than 5% unless agreed with the MMO in writing however there will be areas where there can be no reduction in water depth so the Areas of Interest must be carved out of Condition 4(6) and Condition 12(3). • A remediation clause that clearly sets out the approach to be taken if the cable is installed or not maintained in accordance with the Design Requirement. <p>This above list of revisions is provided on the basis that the drafting in the PLA's protective provisions that has been agreed remains and that a Design Requirement is included within the Articles of the DCO alongside a certified plan which shows the Areas of Interest.</p>

