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Ref: EN020026

Our Ref: [redacted]

13 April 2026

Dear Examination Authority,

Application by National Grid Electricity Transmission (NGET) for an order granting development consent for the South East Anglia Link (Sea Link) Project

Examining Authority's Third Written Questions (ExQ3) Issued 24 March 2026

Thank you for the opportunity to respond to the Examining Authority's third written questions at Deadline 6 (24th March 2026). Please find attached table of responses from the Maritime and Coastguard Agency (MCA) including Annex A which is the summary of outstanding issues.

The MCA is the National Competent Authority for the SUNK Vessel Traffic Services (VTS) appointed by DfT under SOLAS Chapter V - Regulation 12 and His Majesty's Coastguard (HMCG) has responsibility for the day-to-day operation of Sunk VTS. Master Mariners, SUNK VTS operators and representatives of the UK Maritime Services Navigation have contributed to the responses in the attached table.

We hope this is helpful to the Examination Authority.

Yours faithfully,

[redacted]

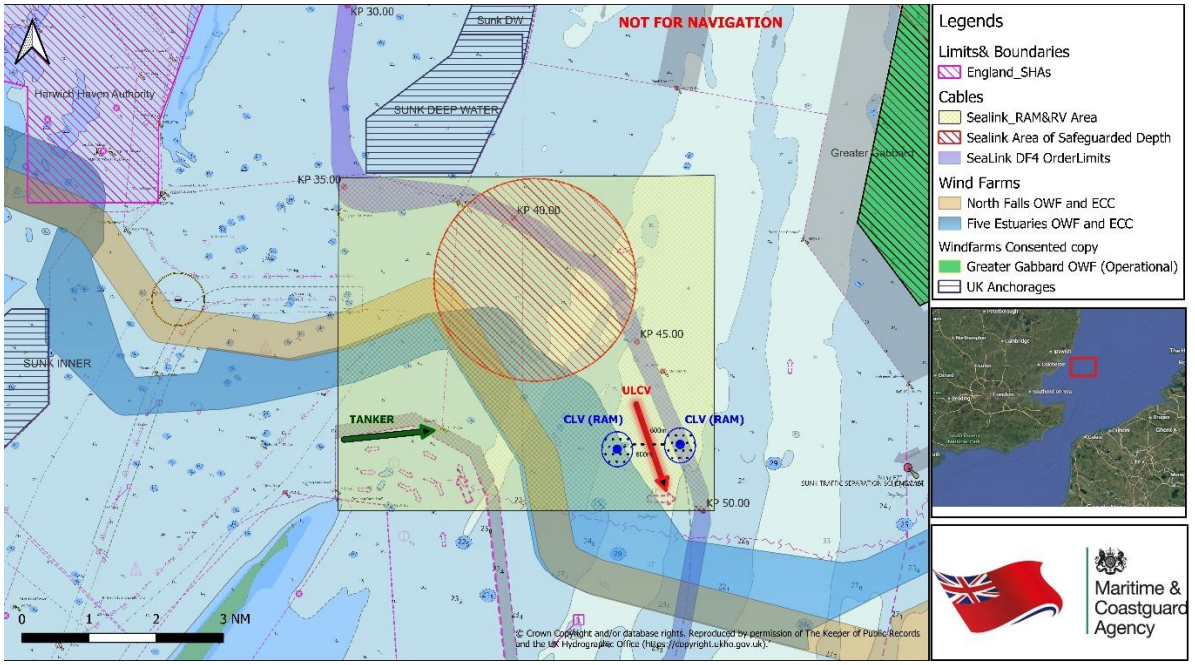
Marine Licensing and Offshore Consenting Manager
Marine Safety and PNT Services

Examining Authority's Third Written Questions (ExQ3) Issued 24 March 2026

In response to the Examination Authority's third written questions issued on 24 March 2026, the MCA would like to comment as follows at Deadline 6, 13 April 2026.

ExQ3	Question to:	Question	Response from MCA
21. Shipping and navigation			
3SN1	Applicant Maritime and Coastguard Agency (MCA)	**Concurrent restricted in ability to manoeuvre (RAM) vessel activities Maritime and Coastguard Agency (MCA):** • Explain whether there has been a change in circumstance that has led to the request for an enlarged area of interest (set out in figure 1 of your response to ISH2.09 in [REP4-164] and your response to action points in	<u>Section A</u> There has not been a change in circumstance. The smaller area originally agreed by MCA for the Five Estuary and North Falls projects was sufficient as both were located to the south of the area, allowing pilotage and other marine operations sufficient safe sea room to the north. However, the Sea Link project now occupies the northern part of the area, significantly reducing the remaining safe sea room and significantly limiting the ability to conduct pilotage, marine operations or transits to/from PLA and HHA. Furthermore, for the vessels proceeding out from PLA and HHA, particularly large vessels, after dropping their pilot they will proceed outwards through the SUNK Outer Precautionary Area to join the outbound lane of SUNK TSS SOUTH. If there are two RAM vessels within this area the remaining safe sea room available for a large vessel is significantly less. This is explained in detail in Section B below with an example to demonstrate this. The SUNK area is very complicated due not only to the size of vessels, but also the multiple sandbanks in close proximity and strong tidal currents. RAM activities require a minimum Closest Point of Approach (CPA) and having concurrent RAM activities to the north and south would significantly limit available sea room, especially during multiple pilotage operations where regularly 3-5 vessels at a time are being serviced. Pilots board / disembark across the Sunk area, not a specific single point and these ultra large container vessels need large amount of space to manoeuvre, with most vessels exiting the area to the Southeast. Having these vessels in effect restricted to a corridor of circa 1nm is a potentially very serious situation. If even a single ultra-large container vessel were to run aground or be involved in a collision within the SUNK, potentially blocking access to two of the UK's most important ports, the consequences for the UK economy could be severe. Such an incident would attract significant

		[REP4-165], if so, provide any additional information to explain what has led to the change in circumstances. • Explain the implications of concurrent RAM vessel activities in terms of safety and the economy and whether any residual effects would be significant/ As Low As Reasonably Practicable (ALARP). • Provide suggested wording and plans to secure the concurrent RAM restrictions that the MCA	international media attention, disrupt multiple sectors of the UK economy, and could also result in substantial environmental impacts. This enhanced area is therefore needed to ensure that any risk to shipping and navigation is ALARP. The importance of this area is highlighted by the fact that in the UK there are only two coastal VTS areas, the Sunk and English Channel, one of the busiest shipping lanes in the world. Also, a recent trend is that, due to the northward migration of the Long Sand bank (within the Sunk area), larger vessels using the Long Sand Head (LSH) two-way route tend increasingly 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 and can therefore create additional navigational constraints. 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, right through the area. 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. Similar issues arise with some fishing vessels, which often switch off their AIS to avoid revealing their location to other fishermen. These additional factors all 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 such small crafts 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. In summary, the MCA requires this defined area of interest to account for a credible worst-case scenario, namely, multiple RAM operations taking place within an already constrained sea area, 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 Ever Given in the Suez Canal, would have significant safety implications, attract global media attention, and be likely to adversely affect the UK economy. The proposed

		seeks and the means of securing it, whether through the dDCO/dDML or a control document such as the Outline Navigation and Installation Plan (oNIP). Applicant: Clarify the implications for the proposed development of restricting concurrent RAM activities in the area of interest requested by the MCA.	restriction is therefore both proportionate and essential to ensuring the Safety of Navigation within the Sunk area. <u>Section B</u>  In the above example, two Cable Laying RAM vessels (blue) are operating in each of the cable corridors (Sealink and Five Estuaries),within the Long Sand Heads two way route: a tanker (green) is –outbound using the northern part of the LSH route (allowing for the migrating sandbank), after dropping pilot, the outbound Ultra Large Container Vessel (red), is forced to proceed southbound between the RAM vessels meaning that the resultant distance to the 500m Recommended Restricted Zone is 600m which is only 1.5 times the vessel length (400m LOA) of an ultra large container. The average turning circle of such a vessel is at least 3-4 times the ship length and the stopping distance is approximately 3-5 ships length depending on various factors including draught, windward area, weather and sea conditions. This scenario is not factoring in any additional traffic like another out bound vessel (slower) ahead of the

			container vessel and recreational vessels crossing through the precautionary area in a SE direction, this will further complicate this scenario and may result in multiple close quarter situations within the precautionary area. Therefore, we believe that the current area of concurrent activities as captured within the NIP does not reduce the risk to navigation safety in this area to ALARP and therefore we don't agree that the residual risk is ALARP for vessel Collisions listed in Table 4.7.A.1 Hazard Log of the NRA. Within the additional mitigation measures column, it is listed that ''***Coordination of operations involving RAM within the Sunk, avoiding concurrent operations with other projects in the Sunk where possible"*** which is what the MCA are trying to achieve through the concurrent RAM activity area shown in Fig.1 of MCA submission [REP4-164]. Furthermore, within the oNIP submitted by Five Estuaries OWF and North Falls OWF during their Examination, it was clearly identified that the Navigation Installation Plan is a live document and therefore the document will be updated throughout the construction, maintenance and operational phase of these projects. It was also identified that there will be HAZOP workshops arranged by Five Estuaries and North Falls to discuss and agree concurrent RAM activities in the area, we believe these workshops will be a platform for Sealink to discuss and plan concurrent RAM activities in the area. Also, we note that based on the surface lay speed we received from the Sealink project team, the total time spent laying the cable within KP35-KP50 may be 17-24 hours and we believe therefore, that by adopting this wider area of interest, an agreement can be reached between all three projects to ensure smooth and safe operations in the area and thereby reduce the risk to navigation safety to ALARP. Suggested wording and plans to secure the concurrent RAM restrictions that the MCA seeks; to ensure no concurrent RAM activities take place within the MCA area of concern, the addition of this Condition which was provided as a post meeting note for MCA/Sealink meeting of 2/3/26 - sent on 17/3/26. *Addition to para. 4(1)(g) of Part 2 of the DML along these lines.* *(g) a navigation installation plan for the relevant stage which—* *(i) is in general accordance with the principles set out in the outline navigation installation plan;*

			(ii) must include a mechanism for agreeing with [the other developers] the dates when each will undertake RAM operations in the [defined area] and; *(iii) may include provision that disputes under paragraph (ii) are to be settled by arbitration).* This was discussed with the applicant on 30th March and is currently under consideration by the applicant.
3SN4	MMO	**Cable burial** Has the applicant's response in [REP5-132] to your concern in relation to cable burial depths from KP 96.343 to 113.83a [REP4-126] provided sufficient information? If not, what more do you require and why.	The applicant has confirmed the document referred to in REP5-132 is Document 9.126: Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements [REP5-139]. Within section 2 of this document, we note that the applicant has included details regarding additional trenching tools and seabed preparation mechanisms. Furthermore, through direct consultation with the applicant we understand that '*between KP 96.343 to 113.883, the ground model indicates the presence of sand waves and chalk bedrock, and the preferred installation approach is likely to involve pre-sweeping followed by mechanical trenching. Following further engineering assessment within the North East Spit Area, and specifically to maintain the Safeguarded Water Depth required by the ports, the Applicant has identified that the use of a backhoe deployed from a spud barge may be required over a limited section between KP 102.4 and KP 104.4. Over this restricted KP range, the installation methodology may involve pre-sweeping followed by backhoe trenching in order to achieve the depth of lowering required.* *The final target depth of lowering will be confirmed through the Main Works Contractor's detailed design, informed by engineering surveys and the burial assessment study. The Applicant has committed to updating the Cable Burial Risk Assessment (CBRA) post-consent. The final depth of lowering will be secured through the Cable Specification and Installation Plan (CSIP), which is in turn secured under DML Condition 4, and will be approved by the MMO prior to cable installation. The MCA is a named consultee for the CSIP and all relevant marine plans'.* Therefore, at this stage we believe the above additional considerations in cable laying along with post consent CBRA and CSIP would be sufficient to address the shallow burial between KP96.32 to KP113.883.
3SN5.	Applicant MMO and other	**Outline Cable Specification and**	The MCA is content with the CBRA except between KP96.343-113.83 where we request deeper burial than recommended in Table 24 of the Cable Burial Risk Assessment [PDA-039].

	relevant stakeholders)	**Installation Plan [REP4-090]** In the MMO's comments in [REP4-126] it is stated that the oCSIP will need to be compared to the CBRA. Has the comparison been undertaken and what is the outcome? Provide details of any concerns the MMO (or other stakeholder) have and any suggested remedy.	However, we note that the applicant has considered additional seabed preparation and laying techniques in this area and a post consent detailed CBRA will be submitted prior to construction. Additionally, Target Depth of Lowering (TDOL) at this location will be detailed in this document. We understand that the MMO and the MCA will be consulted on this post consent documentation and if there are any outstanding issues this can be agreed at the post consent stage.
3SN6	MCA MMO PLA LGPL HHA	**Anchor strike risk** Provide clarification as to whether concerns regarding anchor strike risk, particularly in	The oCSIP [REP5-117] states within section 5.1.2 that in sections of the route identified as having the highest risk of cable strike due to marine traffic, a TDOL of between 2.0 m to 2.5 m is proposed. The oCSIP further details that 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 20% below the original seabed level. The remaining trench depth will be allowed to naturally backfill (Plate 5.1). The MCA recommends that a TDOL of 2-2.5m to be considered for KP33-38 as well, as this is the area adjacent to the SUNK DW anchorage. We note from the applicant that '*consideration has been given to the risks associated with the deep-water anchorage when defining the target*

		relation to the Sunk anchorage would be adequately mitigated by the mitigation measures including the target depth of lowering and external cable protection details set out in the oCSIP [REP4-090]. If not, provide details of any remaining concerns and/ or additional measures that would be required.	*depth of lowering between KP 33 and KP 38. Within this 5 km section and from KP35, approximately 2.9 km adjacent to the deep-water anchorage has a target depth of lowering of 2.0 m. The Applicant has committed to updating the CBRA post-consent in consultation with the MCA, and approval by the MMO. The final depth of lowering will be secured through the Cable Specification and Installation Plan (CSIP), which is in turn secured under DML Condition 4, and will be approved by the MMO prior to cable installation'.* We believe the specifics regarding the TDOL near the SUNK DW anchorage can be agreed through the post consent CBRA and CSIP which the MMO and the MCA will be consulted upon.
3SN9	MMO MCA Port of London Authority (PLA) London Gateway Port Ltd (LGPL) Harwich	**dDML conditions 4 and 12** Do conditions 4(6) and/ or 12(3) need to be amended to apply only to areas outside of the areas	The 5% reduction in water depth applies to the whole cable route. In areas of safeguarded water depth, *a maximum reduction* of 5% or the agreed depth, whichever offers more depth must be considered. This is particularly applicable in the SW section of the NE Spit.

	Haven Authority (HHA) Applicant	where the safeguarded depths are being agreed. If so, provide amended wording. If not, explain why not.	
3SN12	GridLink MMO MCA PLA LGPL HHA	**Planned cable crossing within North East Spit** Provide your comments on the securing mechanisms included in requirement 17(2) [REP5-006] for safeguarding water depths in relation to the potential crossing with the planned GridLink cable.	MCA agrees with condition 17(2) and has no further comments. MCA would appreciate it if the project kept MCA abreast of any agreements secured with GridLink.
3SN13	MMO MCA PLA LGPL HHA	**Cable crossings** Provide your comments on the applicant's proposed	The applicant, as per condition 4(5) and 12(3) of the DML, is required to discuss with the MCA if they are unable to meet the 5% reduction in navigable depth. We believe this is an appropriate mechanism for reviewing any crossings. We expect the 5% condition or agreed safeguarded depth to be maintained for crossings as applicable.

		mechanisms for safeguarding water depths at the point of cable crossings. If you consider that the proposed mechanism is not appropriate, provide a detailed explanation of why not, suggest a more appropriate mechanism and suggested wording, unless already provided.	
3SN14	MMO MCA PLA LGPL HHA	**Planned cable joints within the three areas of safeguarded depth (ASD) on plate 1.2 of [REP4-090]** The oCSIP sets out in	We note the applicant's position and understand that there are no cable joints within the ASD. If this is to change, a detailed assessment may be needed post consent which should be confirmed with the MCA, and relevant navigational stakeholders including port authorities who have requested the Areas of Safeguarded Depth (ASD).

		section 4.4 that there will be no planned cable joints in the three ASDs. Is this sufficient to minimise risks to shipping and navigation to ALARP and mitigate any likely significant effects on shipping. If not, explain the additional measures that are required, and if appropriate provide suggested wording.	
3SN16	MMO MCA PLA LGPL HHA	**Unplanned cable joint repairs** Condition 12 of the dDML [REP5-005] sets out that 'maintenance' includes cable repairs. REAC	We understand that there will not be any planned cable joints within Areas of Safeguarded Depth (ASD) and we are content with this. If this is to change closer to installation, we understand details of any joints and subsequent changes to water depths will be captured within the Cable Specific Installation Plan (CSIP) and MCA will be consulted through MMO.

		provision SN33 states that unplanned cable repair joints will be avoided in the Sunk, so far as practicable, but if such a scenario is unavoidable, the project shall consider potential collision risk and minimize time spent during maintenance in this region as much as possible. The oCSIP [REP4-090] sets out in section 4.4 further detail of the procedure for cable jointing and unforeseen repairs within the three areas of safeguarded water depth.	

		Consider whether these provisions provide adequate safeguards to minimise risks to shipping and navigation to ALARP in this regard, and if not explain why not and suggest alternative or additional measures.	
3SN17	MCA	**Exclusion zones** Clarify whether the inclusion of reference to exclusion zones in dDCO/dDML condition 3 is sufficient. If not, why not.	DML Part 2 (3) (b) states: *"No exclusion zones will be implemented as part of the licenced activities but this does not prevent any Recommended Restricted Zones required by and within the meaning of the Convention on the International Regulations for Preventing Collisions at Sea 1972 as implemented by the Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 (S.I.1996/75)";* Our only outstanding issue with 2(3) b is the reference to the International Regulations for Preventing Collisions at Sea 1972 (COLREGs). This is inappropriate here as the COLREGs do not specify regarding Restricted Zones. MCA have informed the applicant of this, and we believe the applicant intends to make changes to the DML wording and the oNIP to reflect the above.

3SN18	MCA	**Magnetic compass deviation** The dDCO [REP5-005] includes condition 6 of the dDML in relation to compass deviation. Advise whether this meets your requirements. If it does not, explain why not and suggest how this could be overcome.	As explained within MCA submission REP3-107 MCA Response to ExQ1. '*We believe nothing further is required prior to the decision being made on the DCO on the understanding that the MCA requirement is made as a condition of consent'* We agree with condition 6 of the DML and have no further comments on the topic of Magnetic Compass Deviation.
3SN21	MCA MMO PLA LGPL HHA	**Schedule of outstanding matters** Provide a schedule of outstanding matters with a clear explanation of the implications (likely significant effects or	This is provided as a separate table Appendix A below: EXAQ3 Appendix A Areas of outstanding concern.docx

		ALARP) in terms of shipping and navigation if these matters remain unresolved at the close of examination. Where DCO/DML drafting could resolve these matters please provide suggested wording.	

Appendix A

Examining Authority's Third Written Questions (ExQ3)

Appendix A: MCA outstanding items of concern to answer question number 3SN21

Issue	Application document reference	Actions to resolve	Implications if not resolved
1) Area of concurrent RAM activities	NIP – Section 3.3, SOCG – 3.2.7 3.28 & 3.2.13, 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035) Section 7.10, Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048) Section 7.7.1	MCA's area of interest – Figure 1 of REP4--165 as per MCA response to Issue Specific Hearing 2 (ISH2) action points - to be agreed & included within all relevant documents (as referenced in column to left & any additional docs).	We believe that the current area of concurrent activities as captured within the NIP does not reduce the risk to navigation safety in this area to ALARP. RAM activities require a minimum Closest Point of Approach (CPA) and having concurrent RAM activities to the north and south would significantly limit available sea room Having these vessels in effect restricted to a corridor of circa 1nm is a potentially very serious situation. If even a single ultra large container vessel were to run aground or be involved in a collision within the SUNK, potentially blocking access to two of the UK's most important ports, the consequences for the UK economy could be severe. Such an incident would attract significant international media attention, disrupt multiple sectors of the UK economy, and could also result in substantial environmental impacts. Detailed information regarding the concurrent RAM activity area is included within MCA submission ExQA3 as answer to question 3SN1.

2) Navigation Installation Plan	SOCG 3.2.3, 3.2.4, 3.2.7, 3.2.11, 3.2.12, 3.2.13	Address comments as per MCA Deadline 5 submission – specifically MCA new area to be added to NIP Recommend adding HAZOPS workshop as per 5 Estuaries & N Falls NIPS	Installation activities, in high density traffic areas (other than those agreed within the NIP) if not managed properly through the NIP could potentially cause serious incidents or collisions with consequences affecting people, property and the environment.
3) Reduction in water depth (in Sunk deep water anchorage)	Draft DCO DML, Schedule 16 Part 2 4(6) SOCG – 3.2.11 – We need to add burial as per CBRA to above condition- i.e. content of 3rd para in Applicant response to be in DML after Part 2 4 (6)	Burial as per CBRA - Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039) For Water depth baseline study – the wording in Para 1.2.5 and the images in Plates 1.1, 3.1, 3.5 & 3.6	Sunk DW anchorage is used by vessels including ultra large container vessels, any interaction with a shallow buried subsea cable may result in a serious incident which might have implications to the vessel traffic moving through the Sunk and to the vessel itself.

	Water depth Baseline study – Technical Note REP5-120	need amendment to reflect DML condition 4 (6).	
4) DCO	SOCG – 3.2.2	Inconsistencies in numbering with references to DML conditions- e.g. 5% is referred in condition 4(5) of the DCO and it should be 4 (6), and no depth reduction between KP 33 & 38 is referred in 4 (6). Part 6 (2) of DCO references the NIP in 4 (k) and it should be 4 (1) (g) To ensure no concurrent RAM activities take place within the MCA area of concern, the addition of this Condition which was provided as a post meeting note for MCA/Sealink	Inconsistencies within the DCO can cause the conditions to not be correctly fulfilled.

		meeting of 2/3/26 - sent on 17/3/26. Inclusion of reference to exclusion zones in dDCO/dDML condition 3 is sufficient. Our only outstanding issue on condition 2(3) b is addressed in Ex3QA 3SN17. *Addition to para. 4(1)(g) of Part 2 of the DML along these lines.* *(g) a navigation installation plan for the relevant stage which—* *(i) is in general accordance with the principles set out in the outline navigation installation plan;* *(ii) must include a mechanism for agreeing with [the other developers]*	

		the dates when each will undertake RAM operations in the [defined area] and; *(iii) may include provision that disputes under paragraph (ii) are to be settled by arbitration).*	