

## The Great Grid Upgrade

Sea Link

# Sea Link

### Volume 7: Other Documents

Document 7.4.12: Statement of Common Ground Between National Grid Electricity Transmission and the Trinity House

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<b>Version</b>			
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March 2025	A	DRAFT	Issued with DCO application
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# 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 Trinity House (TH). 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 TH throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with TH to resolve issues as the project progresses through the Pre-Examination and Examination phases.
- 1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and TH 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 TH will jointly be referred to as the 'Parties'. When referencing the TH alone, they will be referred to as 'the Consultee'.

## 1.3 Role of the Trinity House in the DCO Process

- 1.3.1 The Consultee is a charity that safeguards shipping and seafarers, provides education, support and welfare to the seafaring community, with a statutory duty as a General Lighthouse Authority to deliver reliable, efficient and cost-effective navigation aids to all, for the benefit and safety of all mariners.

- 1.3.2 The Consultee was incorporated by the Royal Charter in 1514 to regulate pilotage on the river Thames. The Consultee is the UK's largest-endowed maritime charity, the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar.
- 1.3.3 The Consultee informs and guides seafarers to be safe when navigating the river Thames and this input is required for this DCO application in order to ensure that the Project can be completed without compromising the integrity of the Consultee or the safety of those who use the river Thames.

## 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 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**

<b>Abbreviation/Term</b>	<b>Definition</b>
AIS	Automatic Identification System
AtoN	Aids to Navigation
DCO	Development Consent Order
dML	Deemed Marine Licence
DoL	Depth of Lowering
EIA	Environmental Impact Assessment
ES	Environmental Statement
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IMO	International Maritime Organisation
MCA	Maritime and Coastguard Agency
NIP	Navigation Installation Plan
NRA	Navigation Risk Assessment
PEIR	Preliminary Environmental Information Report
PLA	Port of London Authority
PRoW	Public Right of Way
SoCG	Statement of Common Ground
TH	Trinity House
TJB	Transition Joint Bay
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**

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
<i>03 June 2021</i>	<i>The Applicant, TH, Arup, AECOM, 4C Offshore Ltd - background, approach to Shipping and navigation</i> <i>Introductory Meeting</i>	<i>Introduction and objectives, Project Overview, Indicative programme, progress to date, study areas, indicative marine routeing and marine survey scope, next steps; AOB/questions</i>  <i>Actions: The Applicant to keep TH updated in development of route options, including landfall; send notice to mariners and share shape file for survey corridor and final route.</i>
<i>12 July 2022</i>	<i>Marine survey</i>	<i>Additional marine surveys</i>
<i>24 April 2023</i>	<i>Shipping and navigation consultation meetings and Hazard workshop</i>	<i>Shipping and navigation consultation, project update, scoping comments, data sources, assessment methodology. Presented initial results from Navigational Risk Assessment and conducted Hazard workshop to identify potential shipping and navigation impacts.</i>
<i>31 July 2024</i>	<i>Rerouteing</i>	<i>Letter response to updated Order Limits, noting concerns around key Aids to Navigation, Pegwell Bay, depth reduction, changes around Sunk W1 buoy and Sunk Deep Water Anchorage, request for communication plans during surveying and construction periods and importance of continued stakeholder engagement</i>

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
<i>20 August 2024</i>	<i>Shipping and navigation</i>	<i>Routing near Sunk – acceptability of distance to the Sunk W1 buoy</i>
<i>20 August 2024</i>	<i>Deemed Marine Licence (dML)</i>	<i>Review of dML</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-DCO submission discussions**

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
<i>13 May 2025</i>	<i>Submission of Relevant</i>	<i>Trinity House request to be registered as an interested party and intends to provide comments to the Examining Authority (ExA) where applicable during the examination process, in relation to the impact the development may have on the safety of navigation, vessel routeing, and the subsequent provision of aids to navigation, within Trinity House’s area of jurisdiction.</i>

### 3. Areas of Discussion Between the Parties

#### 3.1 Project

Table 3.1 Project

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	The Applicant's Current Position	Status
3.1.1	N/A	Need for the Proposed Project	The Consultee's representative confirmed he understood the context to the Sea Link project and wider National Grid background.	The Applicant confirmed the case for the Proposed Project.	Agreed

## 3.2 Assessment Methodologies

**Table 3.2 Assessment Methodologies**

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	The Applicant's Current Position	Status
3.2.1	<b>Application Document 6.14 Environmental Scoping Report 2022 [APP-299]</b>	Environmental Impact Assessment (EIA) Scoping Report	The Consultee is in agreement with the scope and methodology set out in the EIA Scoping report.	The scope of the EIA that is set out in the Applicant's scoping report (see <b>Application Document 6.14 Environmental Scoping Report 2022 [APP-299]</b> ) and presented at the consultation workshop, is adequate.	Agreed

### 3.3 Shipping and Navigation

Table 3.3 Shipping and Navigation

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
3.3.1	<b>Application Document 6.2.4.7 (D) Part 4 Marine Chapter 7 Shipping and Navigation [REP5-025]</b>	Buoys and routeing	<p>The Consultee suggested generally to keep the cable 200 m away from buoys but that there is a grade of flexibility on this. The buoys have 5-ton sinkers on them and chains to keep in position. They wouldn't need to be moved for surveys, but if the route interferes with buoys in current position there would be some flexibility to move buoys and Sea Link would need to talk to the Consultee.</p> <p>Trinity House requests further comment from the Applicant concerning the status of the route and its proximity to buoys (and other Aids to Navigation, as may be applicable).</p>	<p>The Applicant acknowledged the Consultee's position regarding buoys, and this has been considered in the routeing process.</p> <p>The Applicant confirms that where practicable, a 200m closest point of approach to Aids to Navigation along the cable route would be maintained. Where this is not possible, discussions with the Consultee will take place to reach an agreed offset, as has taken place regarding Sunk Whiskey 1 buoy (see Ref 3.3.14). In the event that subsequent re-routeing during the detailed engineering phase would bring the proposed route closer to buoyage, this will be addressed with Trinity House on a case-by-case basis.</p> <p>For further detail on the route's proximity to buoys and other Aids to Navigation, please see Ref 3.3.7.</p> <p>The Applicant has added a commitment to <b>Application Document 9.84 Register of Environmental Commitments (REAC) [REP5-115]</b> regarding the recommended distance of 200m, as follows: <i>SN36: Where practicable, a 200 m closest point of approach to Aids to Navigation along the cable route would be maintained. Where this is not possible, discussions with Trinity House will take place to reach an agreed acceptable distance. In the event that subsequent re-routeing during the detailed engineering phase would bring the proposed route closer to buoyage, this will be addressed with Trinity House on a case-by-case basis.</i></p>	Agreed
3.3.2	<b>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]</b>	The route feasibility	The Consultee agree the cable route for the Proposed Project is feasible.	The Applicant have noted this, with cable route described fully in <b>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]</b> .	Agreed
3.3.3	N/A	Vessel management plan	The Consultee noted the Northeast Spit is very busy.	The Applicant confirmed the Port of London Authority (PLA) and Maritime and Coastguard Agency (MCA) said there would need to be a robust vessel	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
				management plan to help manage this. The Applicant commits to producing a Navigation Installation Plan (NIP) which will provide a mechanism for communication with relevant stakeholders to reduce potential vessel traffic disruption. The Applicant 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.	
3.3.4	N/A	Coordination – SUNK Vessel Transport Services (VTS)	The Consultee made National Grid aware that it is important that coordination with other ports and the SUNK VTS, as this is a congested area and could result in incidents with other vessels and users. The Consultee also notes that the cable route would consider coordination of vessels with other projects and dredging campaigns.	The Applicant has acknowledged this point and agrees that coordination is necessary. The Applicant will ensure this is undertaken as part of the Proposed Project and has committed to producing a NIP.	Agreed
3.3.5	<b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP5-025]</b> <b>Application Document 6.2.4.7 (D) Part 4 Marine Chapter 7 Shipping and Navigation [REP5-025]</b>	Local aids to navigation on final route at landfall	The Consultee confirmed if the proposed marine route goes to Sizewell past North Ship Wash (National Grid confirmed the Proposed Project would pass east of this and would not cross, but this is still to be confirmed and will be confirmed with the Consultee once finalised), the Consultee would want to discuss further, depending on where landfall could be in relation to local aids to navigation on beaches when developing final route. This matter is considered “agreed” subject to post-consent discussions on route marking which will be undertaken with Trinity House.	The Consultee to agree on this when final route has been reviewed by the Consultee in the Environmental Statement (ES), or if further discussion is needed regarding Aids to Navigation in proximity to the Suffolk landfall.  The Final route in the ES has now been shared. This matter is considered “agreed” subject to post-consent discussions on route marking which will be undertaken with Trinity House.	Agreed
3.3.6	<b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]</b>	Buoyage and marking of cable crossing and Cable Lay around Buoyage	The Consultee highlighted that potential buoyage and marking of cable crossing is not something it recommends except in extreme cases – buoys cause more issues to sea users. Usually, buoyage is refused. The Consultee suggested that Automatic Identification System (AIS) notification/specific messaging would be an option in the future, but not all vessels have this technology at the moment.  With reference to the Sea Link Changes to Order Limits Plans Version A July 2024 the Consultee primarily notes the changes around the Sunk W1 buoy and the Sunk Deep-Water Anchorage. In the Consultee’s opinion moving the order limits, and potential cable lay, closer to the anchorage should be reflected in the NRA and relevant parties consulted further on the outcome.  Further discussion is required regarding marking.	Agreed that buoyage and marking of cable crossings is not required. The DCO / dML has been updated and submitted at Deadline 5 which secures a Requirement for the three Areas of Safeguarded Depth outlined by the Port Authorities, and therefore the navigable depth is secured in the key areas identified by the port authorities.  This change is reflected in the <b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]</b> .  The Applicant has also made the following commitment, as shown in <b>Application Document 9.84 Register of Environmental Commitments (REAC) [REP5-115]</b> : <i>SN15: The use of temporary Aids to Navigation for exposed cable sections will be considered to reduce the risk of interactions with fishing gear vessel anchors particularly near designated anchorages only if absolutely necessary. Details, extent and requirements of the markers will be</i>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
3.3.7	Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]	AtoN Interactions	<p>The Consultee provides Aids to Navigation (AtoN) within, or close to, the order limits and would request that the project formally discusses any planned interaction with these. The Consultee tries to maintain a safe margin between any of its AtoN and cables to allow for them moving off of station due to weather or other reasons.</p> <p>The Consultee's main concerns are around the Sunk W1 buoy, Sunk Centre Buoy, and Gull Buoy, as these lie within the order limits and are significant marks in the area. The Consultee noted the Proposed Project identifies AtoN in Sec 4.8.7.12 of Preliminary Environmental Information Report (PEIR) Vol 1 Part 4 Chapter 8.</p> <p>The proposed order limits in Pegwell Bay and approaches to Ramsgate may also contain AtoN provided by the Statutory Harbour Authorities or other parties such as Royal Thanet Yacht Club. If these are likely to be affected by the project the relevant authorities should be consulted so that they can fulfil their obligations to inform the Consultee of any changes.</p> <p>Similarly, there are beacons in the vicinity of the proposed order limits to the North of Aldeburgh. If these are affected by the project the owners of the beacons and the Consultee should be consulted. The Consultee noted in particular one charted beacon which is an Environment Agency asset.</p>	<p><i>discussed with Trinity House before being confirmed/established.</i></p> <p>Regarding marking, the Applicant's current position on this matter is that other mitigation methods will be used and physical buoyage or marking is not required, but that any potential scenarios where the introduction of an AtoN, including any virtual AtoN, is considered that this will be raised with Trinity House for further discussion and agreement.</p> <p>Route proximity to AtoN is noted within the <b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]</b>.</p> <p>The Applicant has noted the buoys which are the concern for the Consultee, and that the Applicant will engage with the Consultee and buoy owners if these are likely to be affected by the Proposed Project.</p> <p>The Applicant has added a commitment to <b>Application Document 9.84 Register of Environmental Commitments (REAC) [REP5-115]</b> regarding the recommended distance of 200m, as follows: <i>SN36: Where practicable, a 200 m closest point of approach to Aids to Navigation along the cable route would be maintained. Where this is not possible, discussions with Trinity House will take place to reach an agreed acceptable distance. In the event that subsequent re-routing during the detailed engineering phase would bring the proposed route closer to buoyage, this will be addressed with Trinity House on a case-by-case basis.</i></p> <p>The Applicant confirms that the Sea Link planned indicative cable route line is currently more than 200m from the Sunk Centre Light Vessel, being more than 300m from the Sunk Centre at its closest point at approximately KP 46.</p> <p>The Applicant identifies that the Sea Link planned indicative cable route line is currently approximately 150m from the Gull Bouy at its closest point at approximately KP 108.5. The Applicant will therefore discuss this matter further with the Consultee.</p> <p>The Applicant also identifies that the Sea Link planned indicative cable route line is currently less than 200m from an unnamed Special Buoy at its closest point at approximately KP 114. The Applicant will therefore</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
3.3.8	<b>Application Document 6.3.4.7.A ES Appendix 4.7.A (E) Navigational Risk Assessment [REP6-042]</b>	Cable Depth Reduction	<p>The Consultee confirmed depths should not be reduced too much and want to avoid marking shallower areas with more buoys in an already congested area.</p> <p>The Consultee also has concerns over any significant depth reduction created by the cable lay or any additional cable protection used along the route or where the cable crosses other infrastructure. Where there is a depth reduction which could affect safe navigation, the Consultee would request early discussions on the mitigation which, as the project notes, could include AtoN. In some parts of the project limits, the 5% reduction as per Maritime and Coastguard guidance may not be appropriate. The Consultee is grateful that National Grid is discussing this with all parties including the ports and harbours.</p>	<p>discuss this matter further with the Consultee and consult with the owners as advised.</p> <p>Cable depth reduction is discussed in the NRA (<b>Application Document 6.3.4.7.A ES Appendix 4.7.A (E) Navigational Risk Assessment [REP6-042]</b>). The Applicant has noted that continued engagement will be required post submission following review of the final ES in order to agree where further mitigation such as AtoN may be required in areas of depth reduction. Following further discussion with PLA and HHA regarding water depth, the Applicant will seek further engagement with the Consultee to confirm and close out this matter asap.</p> <p>The Applicant confirms that <b>Application Document 9.96 (C) Water Depth Baseline Study – Shipping and Navigation Technical Note [REP6-138]</b> presents additional visual representations of cable crossing locations and their predicted burial depths, Areas of Safeguarded Depth, and concurrent shipping vessel activity. This study provides a clear view of shipping and navigation issues surrounding under-keel clearance and enables further assessment of potential impacts of any reduction in water depth at specific locations.</p> <p>The DCO / dML has been updated and submitted at Deadline 5 which secures a Requirement for the three Areas of Safeguarded Depth outlined by the Port Authorities</p>	Agreed
3.3.9	<b>Application Document Number 6.2.4.7 (D) Part 4 Marine Chapter 7 Shipping and Navigation [REP5-025]</b>	Use of AtoN as mitigation	<p>The use of AtoN as mitigation for exposed cable is recognised in numerous places throughout the NRA and PEIR documentation and proposed consultation with the Consultee before any of these are deployed is also noted. The Consultee does 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 so discussions on this matter, if identified, will be required.</p>	<p>Noted. It is the Applicant's position that the mitigation proposed is proportionate and appropriate for the impact to shipping and navigation receptors as described in <b>Application Document Number 6.2.4.7 (D) Part 4 Marine Chapter 7 Shipping and Navigation [REP5-025]</b>. The Applicant understands that following review of the ES the consultee requests continued discussion to agree mitigations if identified will be required.</p> <p>The Applicant has also made the following commitment, as shown in <b>Application Document 9.84 Register of Environmental Commitments (REAC) [REP5-115]: SN15: The use of temporary Aids to Navigation for exposed cable sections will be considered to reduce the risk of interactions with fishing gear vessel anchors particularly near designated anchorages only if absolutely necessary.</b></p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
				<i>Details, extent and requirements of the markers will be discussed with Trinity House before being confirmed/established.</i>	
3.3.10	N/A	Cable Burial Backfill	<p>The Consultee notes the comment in the Additional Preliminary Environmental Information “<i>The additional rock emplacement being proposed to backfill the marine cable trench should not overtop the top of the trench...</i>”. As this could be used in areas around the Sunk, we consider this should be a defined requirement to avoid any additional depth reductions in those areas.</p> <p>Trinity House welcomes further discussion with the Applicant regarding depth reduction.</p> <p>Post consent, should Trinity House consider any navigable depth reduction poses a hazard to navigation an alternative method or additional risk mitigation measures may be required.</p>	<p>The Applicant understands that avoiding depth reduction in the Sunk area is preferred by the Consultee. The Applicant agrees in-principle that rock emplacement should not overtop the top of trenches where used as backfill. This will be confirmed after the full Cable Burial Risk Assessment has been completed. The development of the Cable Burial Risk Assessment is ongoing and will be consulted on with the consultee post submission. A preliminary Cable Burial Risk Assessment (CBRA) has been undertaken which defines the target Depth of Lowering (DoL) and has been submitted to PINS.</p> <p>The Applicant confirms that <b>Application Document 9.96 (C) Water Depth Baseline Study – Shipping and Navigation Technical Note [REP6-138]</b> presents additional visual representations of cable crossing locations and their predicted burial depths, Areas of Safeguarded Depth, and concurrent shipping vessel activity. This study provides a clear view of shipping and navigation issues surrounding under-keel clearance and enables further assessment of potential impacts of any reduction in water depth at specific locations.</p> <p>The DCO / dML has been updated and submitted at Deadline 5 which secures a Requirement for the three Areas of Safeguarded Depth outlined by the Port Authorities, and therefore the navigable depth is secured in the key areas identified by the port authorities.</p>	Agreed
3.3.11	<b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]</b>	Project Vessels	The Sunk Precautionary Areas are extremely busy shipping routes. The Consultee recommends that there is a coordinated plan for controlling the Proposed Projects’ vessels during the surveying and construction periods. This should be devised in consultation with the Ports, Pilots and other parties with an interest in the area.	Agreed. The formulation of enhanced communication plans and protocols is a key recommendation of the <b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042]</b> .	Agreed
3.3.12	N/A	Request to review dML and draft DCO (dDCO)	The Consultee would also request that it is given an early opportunity to review the draft Development Consent Order and Marine Licence so that any issues may be addressed before the examination period.	<p>The Consultee has been provided the opportunity to review the dML.</p> <p>Noted that review of the dDCO is requested. A draft DCO was submitted with the application and available</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TH Current Position	National Grid's Current Position	Status
3.3.13	N/A	Proximity to Sunk W1 Buoy	<p>Having now had opportunity to review the dDCO/dDML, Trinity House has, alongside this document, produced and submitted a Written Representation with several requested amendments.</p> <p>Subject to those amendments being enacted, we would then be content for this to be amended to 'Agreed'.</p> <p>Normally the Consultee tries to position their buoys about 200 m from cables or pipelines to allow for them moving from position due to weather or being dragged by fishermen.</p> <p>In the area of the Sunk there is likely to be more vessels reporting if the buoy has moved, and as the position is noted in the IMO Routeing Scheme, the Consultee would consider The Applicant's Depth of Lowering (DoL) Route being 151 m North of the Sunk W1 buoy to be acceptable.</p> <p>However, the Consultee would not wish to see it being any closer. This not only protects the Consultee's asset but gives a margin where if the buoy and sinker move, The Applicant's cable is also safer.</p> <p>If during the construction phase of the cable the Applicant need the buoy to be moved the Consultee would wish to engage with the Applicant further. The Consultee would also be able to provide contacts within the Consultee's Operational Teams as any temporary lifting/moving the buoy is likely to require a commercial aspect which the Consultee cannot comment on.</p>	<p>on the PINS website. The Applicant will engage with the Consultee on any feedback received.</p> <p>The Applicant confirms that is has received the comments from Trinity House on the dML which was reviewed and updated by the Applicant and re-submitted into Examination at Deadline 5.</p> <p>At present, the Applicant's DoL route passes to the north of the W1 buoy, maintaining a distance of 151 m. This alignment reflects feedback received from Harwich Haven Authority (HHA) in 2023, who expressed concern that a route south of the W1 buoy would bring the cable too close to their pilot boarding station. The current distance of 151 m from the buoy is considered acceptable, provided it is not reduced further.</p> <p>The Applicant has added a commitment to <b>Application Document 9.84 Register of Environmental Commitments (REAC) [REP5-115]: SN31: The Proposed Project cable will not be routed any closer to the Sunk W1 buoy than the 151 m distance that is currently planned, in order to protect both the buoy and the cable, as agreed with Trinity House.</b></p> <p>Route proximity to AtoN is noted within the <b>Application Document 6.3.4.7.A (E) ES Appendix 4.7.A Navigational Risk Assessment [REP6-042].</b></p>	Agreed

## 4. Approvals

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**Signed**



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**On Behalf of**

National Grid

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**Name**



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**Position**

Senior Consent Officer

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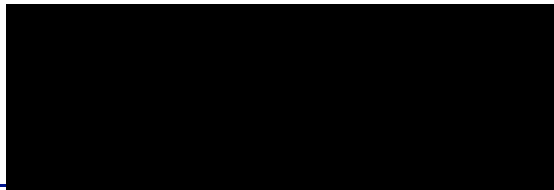
**Date**

23 April 2026

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**Signed**



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**On Behalf of**

Trinity House

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**Name**



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**Position**

Navigation (Examiner) Manager

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**Date**

23<sup>rd</sup> April 2026

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## 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>

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)