

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 7: PORT OF LONDON
AUTHORITY'S RESPONSE TO THE EXAMINING
AUTHORITY'S RULE 17 LETTER**

1 INTRODUCTION

1.1 Below is Port of London Authority's ("PLA") response to the Examining Authority's Rule 17 letter dated 21 April 2026

Number	Subject	Question/Clarification	Response on behalf of the Port of London Authority
15.2	Trial Trenching	<p>The Port of London Authority (PLA) [REP6-140] has queried the removal of trial trenching from the definition of 'commence' in article 2 of the dDCO. The applicant is requested to engage with PLA to agree a position on this matter and submit to the examination.</p>	<p>The PLA and the Applicant met on 24 April 2026 to discuss this matter.</p> <p>Trial trenching is a pre-construction activity that may be carried out before the cable is installed. At deadline 6 the Applicant set out at section 3.2 of the outline Cable Specification and Installation Plan [REP6-137] that trial trenching if required would not be undertaken within the three Areas of Safeguarded Water Depth. The PLA welcomes this confirmation.</p> <p>Table 1.2 of the outline Offshore Construction Environmental Management Plan [REP6-073] provides a high-level list of pre-construction activities. The PLA considers that trial trenching does not fall within the definition of any of the pre-installation activities currently detailed within table 1.2 and it should therefore be included. An overview of the activity should also be provided in section 1.10. The outline Navigation and Installation Plan ("oNIP") [REP6-100] at section 2.2 should also include information about trial trenching if it is proposed within the geographic scope of the oNIP.</p> <p>The Applicant must also include a commitment in relation to trial trenching in the Register of Environmental Actions and Commitments at deadline 7.</p> <p>The PLA understands that the above updates will be made at deadline 7 and, with those updates, the PLA considers this matter has been satisfactorily addressed.</p>
15.6	DML condition 4(4) consultation	<p>The PLA has suggested [REP6-140] that dDML condition 4(4) should require the MMO to consult with the parties involved in approving the plans or protocols, statement or details referred to in condition 4 before allowing any deviation from the approved document. The applicant is requested to engage with the relevant stakeholders (including MMO, MCA, PLA, LGPL, NE, JNCC) to agree and submit any revised wording for the DML. If this is not possible the ExA requests that any outstanding disagreements are fully explained by the parties.</p>	<p>The PLA and the Applicant met on 24 April 2026 to discuss this matter.</p> <p>The PLA understands from the MMO's deadline 5 response [REP5-175] that the MMO does not consider this amendment appropriate. No explanation is given for this, and the PLA considers that whilst the MMO would be required to consult the PLA on initial plans, the Applicant and the MMO could subsequently approve non-compliance with those plans without further consultation with the PLA.</p> <p>Noting the MMO's position, the PLA and the Applicant have discussed and agreed an alternative approach which would secure consultation on any proposed non-compliance with plans within the PLA's protective provisions. The PLA's protective provisions will at deadline 7 contain the following wording at paragraph 3:</p> <p>"3. The undertaker will consult the PLA:....</p> <p><i>(4) where the undertaker is seeking the written agreement of the MMO pursuant to condition 4 (4) of the Deemed Marine Licence to carry out a specified work other than the in accordance with the plans referred to in this paragraph 3 that have been approved by the MMO."</i></p> <p>This means that the Applicant will consult the PLA if any non-compliance with approved plans is proposed. The PLA considers that with this consultation provision in its protective provisions that this matter has been satisfactorily addressed.</p>

Number	Subject	Question/Clarification	Response on behalf of the Port of London Authority
15.8	Cable crossing with Gridlink Interconnector	London Gateway Port Limited (LGPL) [REP6-267] has suggested revised wording to requirement 17 to ensure that the crossing with Gridlink Interconnector is located in areas of deeper water depth without bringing into question the minimum depths secured by requirement 17. Applicant to provide comments on a) the need for such a provision b) the form of wording suggested by LGPL and if necessary provide an alternative form of wording.	<p>Whilst this question is not directed at the PLA, the matter is of interest to the PLA given that the crossing of Sea Link and GridLink would occur within the North East Spit area of safeguarded water depth.</p> <p>At deadline 6 the Applicant included additional wording in relation to requirement 17 which states:</p> <p><i>“(3) No part of Work No.6, including any associated development or ancillary works, is to be installed within the Sea Link Exclusion Area as shown on the Areas of Safeguarded Water Depth Plan”</i></p> <p>The PLA has no objection to this wording and it addresses the PLA's position that controls are required in relation to the Sea Link - GridLink crossing point to ensure that if Sea Link is installed first, GridLink can still be brought forward and water depths safeguarded.</p> <p>The PLA has also reviewed the amendments to requirement 17 that were proposed by London Gateway Port Limited at deadline 6 [REP6-267]. The PLA also has no objection to this wording which also addresses the PLA's position that controls are required in relation to the Sea Link – GridLink crossing.</p> <p>The PLA further understands that London Gateway Port Limited are proposing an amendment to 1(3)(d)(i) of the Deemed Marine Licence as follows:</p> <p><i>"If Work No.6 is installed first, the undertaker must install Work No.6 at a depth that provides sufficient vertical clearance for the GridLink Interconnector Project cable(s) to be laid so that subsequent installation of the GridLink Interconnector would not preclude or impede the dredging of those parts of the Areas of Safeguarded Water Depth to the depth specified in Requirement 17 of Schedule 3 and but where the undertaker has provided such sufficient vertical clearance the undertaker is not responsible for any failure by the GridLink Interconnector Project to meet the required depth protection caused by the subsequent installation of the GridLink Interconnector Project cable(s); and"</i></p> <p>The PLA support this change.</p>
15.9	Restricted Zones	LGPL [REP6-267] raised concerns regarding the protocols or processes to be adopted. LGPL is requested to comment as to whether the updated oNIP [REP6-099] provides sufficient commitment. If not, set out additional commitments that LGPL considers necessary.	The PLA notes and supports London Gateway's comments regarding restricted zones and has stated that the size of the recommended restricted zones may need to be reduced in order for port operations not to be significantly disrupted at certain times, in areas such the Sunk boarding and landing area (see for example section 7 of REP5-177). The PLA has therefore adopted the same wording that London Gateway Port Limited have requested in their protective provisions regarding the need to minimise the impact of restricted zones. This has been agreed by the Applicant and will be included in the updated dDCO at deadline 7.
15.10	Cable crossings in the Sunk and Long Sand Head	LGPL [REP6-267] has requested a condition providing that there should be no cable crossings in these locations and has suggested the following wording: "there are to be no cable crossings caused by the construction of Work No.6 in the Sunk Pilot Boarding area or the Long Sand Head Two-Way Route crossing area." The applicant is requested to provide comments on the need for such a condition and if it is necessary, the means of securing it.	<p>The Applicant produced at deadline 1A a Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038] which provides a summary of in service cables that would need to be crossed (table 4.2) and a summary of planned cables that would need to be crossed (table 4.3). No crossings of existing or planned cables are proposed within the Sunk Pilot boarding area of the London Sand Head Two-Way Route crossing area. The PLA was therefore content for DML condition (3)(e) to simply refer to the North East Spit Area.</p> <p>The PLA notes the suggestion of London Gateway Port Limited and has no objection to the inclusion of this wording within the DCO as it will provide absolute certainty that there will be no crossings within the Sunk Pilot Boarding Area and the Long Sand Head Two-Way Route crossing area.</p>