

Sea Link

Volume 7: Other Documents

Document 7.4.10: ~~Draft~~ Statement of Common Ground Between National Grid Electricity Transmission and the Maritime and Coastguard Agency.

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)

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Version

Date	Version	Status	Description / Changes
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1
January 2026	C	DRAFT	Issued to PINS for Deadline 3
March 2026	D	DRAFT	Issued to PINS for Deadline 5
<u>April 2026</u>	<u>E</u>	<u>FINAL</u>	<u>Issued to PINS for Deadline 7</u>

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 Maritime and Coastguard Agency (MCA). 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 MCA throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with MCA to resolve issues as the project progresses through the Pre-Examination and Examination phases.
- 1.2.3 This draft SoCG was shared with the MCA shortly before Deadline 1. Due to the limited time before the deadline, no comments have yet been received on this version. Any new matters added since then are marked as "under discussion." The Applicant will continue collaborating with the MCA to resolve issues during the Examination phase and will update future versions of the SoCG to reflect any agreements reached.
- 1.2.4 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and MCA 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.
- 1.2.5 For the purpose of this SoCG, the Applicant and the MCA will jointly be referred to as the 'Parties'. When referencing the MCA alone, they will be referred to as 'the Consultee'.

1.3 Role of the Maritime and Coastguard Agency in the DCO Process

- 1.3.1 The Consultee is an executive agency of the Department for Transport (DfT), providing a 24-hour maritime and coastal search and rescue emergency coordination and response service for the United Kingdom.
- 1.3.2 The Consultee produces legislation and guidance and provides certification to ships and seafarers, as well as policy advice for the DfT for Ministers.
- 1.3.3 The Consultee is responsible for implementing British and international maritime law and safety policy and is governed by the DfT and the Secretary of State for Transport.
- 1.3.4 The Consultee is also the National Competent Authority for Vessel Traffic Services (VTS) appointed by DfT under SOLAS Chapter V - Regulation 12. VTS Centres are either operated by Ports or lay outside of the legal authority of a port and thus must be operated by a Coastal State. The MCA operates two 'Coastal' VTS Centres, the SUNK and Channel VTS. His Majesty's Coastguard (HMCG) have responsibility for the day-to-day operation of Sunk and Channel.

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 400 kV 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.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
DfT	Department for Transport
EIA	Environmental Impact Assessment
EMF	Electromagnetic Field
ES	Environmental Statement
ESO	Energy System Operator
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
NIP	Navigation Installation Plan
NRA	Navigational Risk Assessment
PLA	Port of London Authority
PRoW	Public Right of Way
SAC	Special Area of Conservation
SoCG	Statement of Common Ground
TJB	Transmission Joint Bay
TSS	Traffic Separation Scheme

Abbreviation/Term	Definition
UKMA	UK Masters Association
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

Date	Topic	Discussion points
28 April 2021	<i>The Applicant, MCA, Aecom, Arup – Project Introduction and Routeing Briefing meeting</i>	<i>Project introduction and background, the Applicant approach to developing proposals, Sea link Project – overview, indicative programme, progress to date, study areas, indicative marine route and marine survey scope, next steps; questions/AOB. Actions: The Applicant to MCA advance notice of consenting route, The Applicant to contact MCA to understand potential vessel management concerns for Sea Link.</i>
11 May 2021	<i>The Applicant, MCA, Arup, AECOM - Routeing; Shipping and navigation Meeting</i>	<i>Project background and need case – the Applicant –responsibilities under the Electricity Act, network capability identified by National Grid Energy System Operator (ESO); approach to developing proposals – the Applicant to give advance notice of consenting strategy to MCA; Sea Link – overview of progress, marine route options, study area: AOB/questions.</i>
07 June 2021	<i>The Applicant, MCA, Port of London Authority (PLA), Aecom, 4C Offshore Ltd – Stakeholders, route moved outside Routeing briefing meeting – Margate and Long Sands Special Alternative routeing through the Area of Conservation (SAC), Sunk</i>	<i>Introductions and objectives, route update – using feedback from stakeholders, route moved outside Routeing briefing meeting – Margate and Long Sands Special Alternative routeing through the Area of Conservation (SAC), questions and AOB. Actions: The Applicant to consult MCA and PLA on Vessel Management Plan, the Applicant to confirm final marine route.</i>

Date	Topic	Discussion points
04 July 2022	The Applicant, MCA, Port of Felixstowe, Port of London Authority - Additional marine survey	Additional marine surveys (Teams meeting). Concerns over Goodwin Sands Marine Conservation Zone (MCZ) and GridLink Crossing, Nemo Link crossing, proposed marine route refinements to the East of Shipwash.
12 July 2022	The Applicant, MCA, Trinity House, Harwich Authority - Additional marine surveys; routeing	Trinity Routeing and Additional marine surveys (Teams meeting). Marine route corridor through the Sunk Traffic Separation Scheme (TSS), East of Shipwash, GridLink crossing, route adjacent to Goodwin Sands.
24 April 2023	Shipping and navigation consultation meeting and Hazard workshop	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, in a remote meeting.

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 application discussions

Date	Topic	Discussion points
23 June 2025	Submission of Relevant Representations	Relevant Representations covered the following topics: routeing consultation, consultation regarding Tongue Pilot Station proximity, the Navigation Installation Plan, cumulative impacts, navigable depth and protective measures, future vessel draught considerations,

Date	Topic	Discussion points
		electromagnetic fields and shipping and navigation.
11 December 2025	Areas of Interest	Discussion of Areas of Interest across the offshore route for safeguarding of water depths.
16 January 2026	Areas of Interest	Clarification on MCA Areas of Interest
19 February 2026	Shipping and Navigation	Monthly Teams Meeting with Port Authorities to discuss Concurrent RAM activities and Water depth Safeguarding
02 March 2026	MCA Areas of Interest	<u>Teams meeting discussing</u> <u>Clarification on MCA Areas of Interest and dML condition wording.</u>
<u>03 March 2026</u>	<u>Comments on NIP</u>	<u>Email from MCA with comments on NIP</u>
<u>09 March 2026</u>	<u>SoCG comments and comments on Water Depth Baseline</u>	<u>Email from MCA with comments on SoCG and Water Depth Baseline</u>

3. Areas of Discussion Between the Parties

3.1 Assessment Methodologies

Table 3.1 Assessment Methodologies

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.1.1	<p>Application Document 6.14 Environmental Scoping Report 2022 [APP-299].</p> <p>Application Document 6.15 Scoping Opinion 2022 [APP-300].</p>	Environmental Impact Assessment (EIA) Scoping Report	The Consultee confirms EIA Scoping Report is adequate. The Consultee provided a range of aspects to consider as the project progresses to ensure the safety of navigation is maintained during and after installation.	The scope of the EIA that is set out in the Applicant's scoping report (see Application Document 6.14 Environmental Scoping Report 2022 [APP-299]), taking account of the Consultee's comments made in its response to the request for a scoping opinion (see Application Document 6.15 Scoping Opinion 2022 [APP-300]), is adequate.	Agreed

3.2 Shipping and Navigation

Table 3.2 Shipping and Navigation

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.2.1	N/A	Sunk Vessel Traffic Services (VTS) Coastal VTS	<p>The Consultee confirmed the MCA is responsible for Sunk VTS and any matters regarding the Sunk VTS should be discussed with the Consultee.</p> <p>The Consultee confirmed the Coastal VTS is run by Dover Coastguard and to speak to MCA regarding this as they are involved in discussions with other developers.</p>	<p>The Applicant has noted this clarification from the Consultee.</p> <p>The Applicant has initiated contact with Dover representatives regarding the Coastal Vessel Traffic Services (VTS).</p>	Agreed
3.2.2	<p>Application Document 6.3.4.7A ES Appendix 4.7.A (C) Navigational Risk Assessment [REP4-048].</p> <p>Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038].</p>	Reduction in water depth	<p>The Consultee confirmed there would be a concern if there was any reduction in water depth particularly in relation to access to Harwich Haven, Felixstowe and the PLA port and crossing in deep water channel.</p> <p>The Consultee noted that 5% change in water depth is a trigger point for discussion on impact with National Grid, although any reduction in an area with minimal vessel clearance should be discussed further and secured through a condition of consent.</p> <p>The Consultee also noted that any depth reduction in areas where deep-draught vessels operate must be reviewed. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA and secured through consent conditions. This is especially critical near North Shipwash, the SUNK area (including W1, precautionary areas, and the Long Sand Heads two-way route), west of Thanet OWF, and approaches to Pegwell Bay. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met.</p> <p>The MCA would like the following secured:</p> <p>Safeguarding navigable depth and preventing anchor strikes by deep draught vessels in the vicinity the SUNK DW anchorage. See figure 2 below. This area is between KP 33 and KP 38, we are aiming for no depth reduction, adequate burial as per recommended Depth of Lowering in the Cable Burial Risk Assessment, including any potential anchor interaction with associated protection measures.</p>	<p>The Applicant notes the Consultee's concerns regarding navigable depth and protective measures, and the particular areas of concern listed which include near North Shipwash, the SUNK area, west of Thanet OWF, and approaches to Pegwell Bay.</p> <p>Water depth reduction is discussed in the Navigational Risk Assessment (see Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048]). Additionally, the Applicant has produced a technical note (see Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]) which provided further detail on cable crossings and potential impacts on under-keel clearance.</p> <p>The Applicant agrees that a 5% change in water depth would require further discussions with the Consultee if this were to occur. This is currently secured as Condition 4(6) within the Deemed Marine Licence and is applicable to the whole Offshore Scheme and not just the Areas of Interest identified by the MCA. The Applicant confirms that Application Document 9.96 Water Depth Baseline Study – Shipping and Navigation Technical Note [REP4-093] was submitted at Deadline 4, which identifies specific locations where the 5% requirement may not be met, and where the Applicant will engage with the MCA accordingly.</p> <p>The Applicant has been working with stakeholders including PLA, London Gateway Port and HHA, to understand the areas where they wish to safeguard water depth and will continue to do so through Examination with the goal of providing clarity, reaching agreement on this matter, and minimising potential impacts. The Applicant confirms that</p>	Under discussion Agreed

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
			<p>Securing the 22m safe guarded depth for future dredging as agreed with the ports. This area is between KP 38 and KP 44, we fully support the Port's requirement for the cable (and any covering material e.g. rock armour) to be at least 22 metres below Chart Datum in the vicinity of the Deep-Water (DW) Route and DW Anchorage to allow future vessels with a draught of 20 metres.</p> <p>Long Sand Head and NE Spit. Sea Link is committed to 12.5m depth below chart datum to be maintained within the Long Sand Head (LSH) two-way route and at the Northeast Spit which has been agreed with the ports for their purposes, and the MCA fully supports. We would like to ensure burial in the LSH route (between KP 60 and KP 66) is as per CBRA and apply the 5% maximum depth reduction which is achievable with the water depth at this location. NE Spit (between KP 85 and KP104) where the water depth is less than 12.5m, the 5% reduction may not be appropriate across this area.</p> <p>The 5% maximum depth reduction would therefore only apply outside of those areas where safe guarded depths are agreed / being agreed between the Ports, MCA and the applicant.</p> <p>In addition, at KP 33-38 the MCA would like no depth reduction as per CBRA, due to the proximity of the Deep-Water anchorage.</p> <p><u>The MCA welcomes the additional wording in the DCO dMML part 2 Schedule 16 to secure this. KP33-38 which falls outside the Area of Safeguarded Water Depth and is near the SUNK DW anchorage. The MCA believes the existing water depth here should not be changed.</u></p> <p><u>The reference to KP33 – 38 should therefore remain within the DCO dMML in order to safe guard navigable depth and preventing anchor strikes by deep draught vessels in the vicinity the SUNK DW anchorage:-</u></p> <p><u>Condition 4(6) In undertaking the licensed activities, the undertaker must not reduce existing water depths between KP 33 and KP 38 unless agreed with the MMO in writing in consultation with the MCA and Trinity House.</u></p>	<p>Application Document 9.104 Areas of Safeguarded Water Depth Plan [REP4-098] was submitted at Deadline 4. The Applicant also confirms that Application Document 9.92 (A) Outline Cable Specification and Installation Plan [REP4-090] includes our commitment to not impeding the Areas of Safeguarded Water Depth and has also been submitted at Deadline 4 which is secured within the dDeemed Marine Licence (dMML) under Condition 4.</p> <p>Condition 4 of the dMML requires the Cable Specification and Installation Plan to be submitted to and approved by the MMO before works can commence. This Plan needs to be in accordance with the outline Plan (which already features the commitment). Once submitted to and approved by the MMO it forms part of the licences activities which are enforced by the existing and comprehensive regulatory regime under the Marine and Coastal Access Act 2009.</p> <p>In addition to this and following recent discussions with the Port Authorities, the Applicant has also now included a bespoke DCO Requirement in its submission at Deadline 5 Application Document 3.1 (H) draft Development Consent Order [REP5-005].</p> <p>The Applicant confirms that a Post Lay burial survey would be completed post installation. This is currently secured within Application Document 9.92 (A) Outline Cable Specification and Installation Plan [REP4-090] has been submitted at Deadline 4 which is secured within the deemed Marine Licence (dMML) under Condition 4. The Applicant also notes the following feedback received from the MCA at Deadline 4:</p> <p>It is the MCA's view that the requirement for a post-lay cable burial survey (to confirm the target has been met) is suitably secured in the DCO dMML part 2 Schedule 16 Conditions 14, which states:</p> <p><i>14. (1) The undertaker must submit to the MMO within three months of completion of licensed activities, an 'as built' plan which will display (a) the location of the cable as laid with specific details of the achieved burial depths, (b) locations of buried and surface-laid cables, (c) the placed location and quantity of rock placement or concrete mattresses used in these licensed activities; and (d) final clearance depths over the protected cables and clumped disused cables.</i></p>	

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
				<p>Regarding the MCA's request for no depth reduction between KP 33-38, the Applicant has added text to the DCO DdML part 2 Schedule 16 at Deadline 6 to secure this:</p> <p><i>4. (6) In undertaking the licensed activities, the undertaker must not reduce existing water depths between KP 33 and KP 38 unless agreed with the MMO in writing in consultation with the MCA and Trinity House.</i></p>	
3.2.3	<p>Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035]</p> <p>Application Document 7.8 Red-Throated Diver Protocol [APP-361]</p>	Communication plans	<p>The Consultee confirmed that given the complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital.</p> <p>The MCA would expect a Navigation Installation Plan (NIP) for the key areas of interest (AOI), and a Vessel Traffic Management Plan (VTMP) for the full cable route.</p> <p>The NIP is currently specific to the Ports AOI.</p> <p>The MCA stresses the importance of proactive and transparent communication with ports, harbours, and Estuary Services. Installation vessels must clearly communicate their intentions and activities to ensure safe operations in this critical area. The proposed route intersects one of the UK's key routing measures. The project team must take all necessary steps to minimise navigational risks and ensure that all activities in the SUNK region are promptly communicated to SUNK VTS and relevant port authorities.</p> <p>Any survey works conducted within the SUNK area must also be coordinated with the relevant port authorities and the MCA.</p> <p>The NIP submitted at deadline 4 includes a new area KP55-KP66 as IMO Routing measures Aol. The MCA recommended the applicant extend this area (which was originally from KP35-54) to <u>KP 33-70</u>. Part of this has been completed but it must be from KP 33 to capture details regarding the area west of SUNK DW anchorage. KP66-70 (west of LSH) is used by dredgers to access the aggregate areas and they are fairly regular traffic.</p> <p>We also recommended to include an area near <u>Goodwin Knoll</u> which is the main route access for Port of Ramsgate- between <u>KP105-115</u>.</p> <p>The MCA requests that further updates are carried out within the NIP if it is to be considered as a substitute to a VMP for safe navigation.</p>	<p>The Applicant understands the importance of proactive and transparent communication with ports, harbours, and Estuary Services.</p> <p>The Applicant is in agreement with the Port Authorities that the Navigational Installation Plan (NIP) is the most appropriate place to secure concurrent RAM operations. This also aligns with the approach taken in the Five Estuaries and North Falls DCO applications.</p> <p>The Applicant has prepared a NIP to provide necessary communications with key stakeholders including the Consultee, the Sunk VTS and relevant port authorities and provide vessel management details. This is noted in Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035].</p> <p>The Applicant submitted an initial 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.</p> <p>The Applicant notes the expectation of a Vessel Traffic Management Plan. As set out in Application Document 7.8 Red-Throated Diver Protocol [APP-361], the Applicant has included a commitment to develop a Vessel Management Plan (VMP) post consent which will be prepared in consultation with Natural England to minimise disturbance to Red-Throated Diver. However, the Applicant considers that a Vessel Traffic Management Plan is not required for the Sea Link project in regard to shipping and navigation. The Applicant has committed to the production of a Navigation and Installation Plan (NIP), which provides relevant project details to stakeholders enabling communication and collaboration, and represents a key management of risk with regard to shipping and navigation at the key areas identified through consultation with stakeholders. The Applicant considers that as this is an offshore cables project rather than a wind farm, and there will only be a limited number of project vessels operating in the cable corridor at any one</p>	Agreed Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
			<p>Other general comments and feedback have been provided to the applicant which we expect to be addressed in the document regarding safety zones and restricted zones. It is to be noted that Safety Zone is not the right terminology here if the intention is to have a Rolling Recommended Restricted Zone (RRZ) around RAM vessels. Safety Zone is not a general term, but a specific term for an area secured through DESNZ for offshore structures. We recommend to remove any reference to Safety Zones and use RRZs instead.</p> <p><u>-The applicant confirmed on 27 April via email that this definition is being amended for Deadline 7 to remove the reference to the COLREGS. -This will also be removed from the NIP. The dDML will instead cross reference to the oNIP in Condition 1(3)(b).</u></p> <p><u>On the understanding that this is amended in both the dML and the NIP in line with MCA feedback, the MCA would be content. The MCA do not currently have the Deadline 7 updated NIP to confirm this but trust it will be included.</u></p>	<p>time, a VTMP for the whole route would not be proportionate.</p> <p>The Applicant has reviewed and updated Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-076] in consideration of the MCA's feedback. This Plan has been updated to extend its remit to other Areas of Interest identified by the Consultee. This plan is secured within the deemed Marine Licence (dML) under Condition 4.</p> <p>The Applicant also confirms that it is reviewing comments received at Deadline 4 from the MCA with regards to the NIP following on from our call 02 March 2026. <u>These updates have been applied to the NIP and it was resubmitted at Deadline 6 as Application Document 9.12 (C) Outline Navigation and Installation Plan [REP6-099] with the NIP Areas of Interest expanded to meet the MCA's comments, and terminology surrounding RRZ updated accordingly.</u></p>	

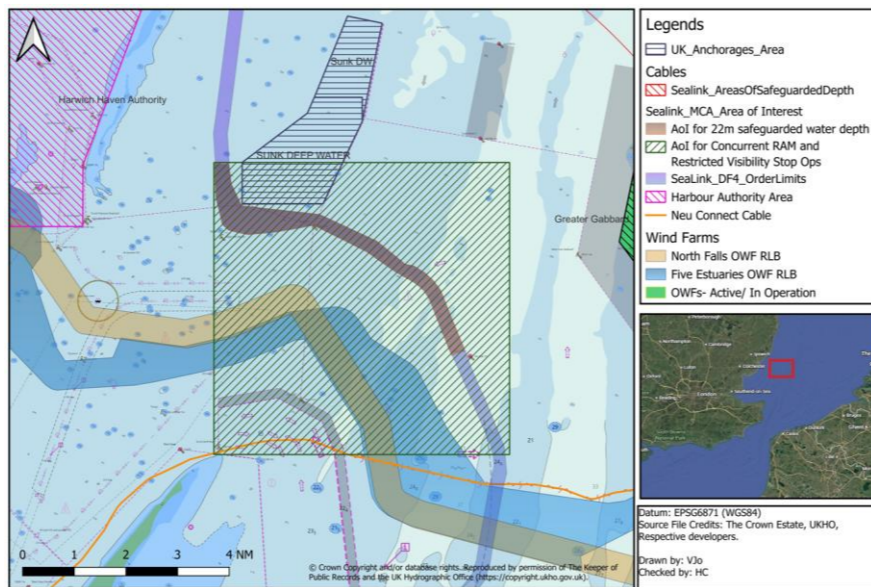
Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.2.4	Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048]	Pilot boarding areas (Sunk and Tongue)	<p>The Tongue pilot boarding area is specifically for PLA inbound / outbound vessels, operated by operated by Estuary Service operating out of Ramsgate. They would need to be aware of the work and be part of the consultation process.</p> <p>The Sunk Pilot station is for vessels inbound from both PLA, Harwich and Felixstowe. The pilot service is operated by HHA to serve both their own traffic but also to board PLA pilots.</p> <p>Management measures would need to put in place to manage the impacts during cable installation in this area. The Consultee confirmed the planned Sea Link cable route passes near to Sunk pilot station and would need a good vessel management plan for construction.</p> <p>Survey work must be communicated widely and intentions made clear prior to commencement of work and facilitate clear communications when working in the area.</p> <p>The Consultee also noted an initial navigational concern in the areas north into the Shipwash but understood this is away from pilots.</p> <p>The Consultee advised National Grid to be aware of the location of Tongue pilot boarding station. Management measures would need to put in place to manage any impacts during cable installation in this area. The Consultee noted the more sea room to the east of the Tongue pilot station and confirmed that with a traffic management plan in place it shouldn't have detrimental impact on pilot boarding.</p> <p>The Consultee notes that the proposed cable corridor proximity to the Tongue Pilot Station necessitates consultation with Estuary Services and the Port of London Authority (PLA), who are likely to be most affected by any potential restrictions.</p> <p>It must be noted that Pilot boarding/dis-embarking is an 'area' and not a specific point. Vessels are usually requested to come to a position 1NM to the east of the pilot boarding area or 1.5 northeast for the ultra-large vessels. The vessels are then given a heading to board which could be any heading based on the weather / sea conditions. As such, vessels are boarded anywhere to the east of a line drawn North-South through the pilot diamond, including in the anchorages. The same applies to vessels disembarking a pilot which could be anywhere in (or close) to one of the Deep-Water Routes in the Sunk Inner.</p>	<p>The proximity of the planned route to pilot boarding areas is acknowledged. A Navigation Installation Plan (NIP) has been produced to provide clear communication throughout cable construction activities. The Applicant submitted an initial 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 <u>(see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104])</u>.</p> <p>The Applicant confirmed the proposed Sea Link marine route passes reasonably close to the Tongue pilot boarding station. Again, it was agreed that good communication using a Navigation and Installation Plan (NIP) around Tongue will help to mitigate impacts.</p> <p>Any potential risk of disruption to pilot boarding areas is considered in Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048].</p> <p>The Applicant agreed that it was an important design criterion to avoid pilot areas and locate away from anchorage areas.</p> <p>The Applicant agreed that a vessel management plan is a good idea to manage construction risks. This will take the form of an NIP.</p> <p>The Applicant has undertaken consultation with the PLA and will continue to do so throughout the pre-Examination and Examination phases. The Applicant interprets that 'Estuary Services' in this context refers to 'Estuary Services Ltd', which the Applicant understands is a subsidiary company owned by PLA, and thus will have had input into PLA consultation.</p> <p>Further to the above, the Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] was submitted at Deadline 4 in consideration of the MCA's feedback and is secured within the deemed Marine Licence (dML) under Condition 4.</p> <p>The Applicant also confirms that it is reviewing comments received at Deadline 4 from the MCA with regards to the NIP following on from our call 02 March 2026. The updated Outline NIP will be <u>submitted at Deadline 6</u> Please see</p>	Agreed Under discussion

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				<u>Application Document 9.12 (C) Outline Navigation and Installation Plan [REP6-099]</u>	
3.2.5	Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048]	Notifications to local ports and users	The Consultee advised National Grid to make sure the right notifications to local ports and users are issued.	In mitigation of such risks the Applicant intends to issue Notice to Mariners, and navigation warnings will be sent to a distribution list which will include Port and Harbour Authorities. This is noted in Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048] .	Agreed
3.2.6	N/A	Overall route through the Sunk TSS	The Consultee noted that there is no ideal route through the area. The original plan was closer to the Sunk pilot station which the applicant has now moved North. This then puts the cable closer to the Sunk deep water anchorage, so it is a compromise. Once installed with the appropriate risk mitigation measures in place and secured in the DCO dML, it should not have any detrimental effect on operations in the Sunk area. The challenges will be during the installation phase which is why a good NIP and VMP will be important.	The Applicant noted that the route through the Sunk TSS appears a good approach given the various constraints. There is a compromise between locating as north as possible of the shipping channel and close to 90 degrees as possible. The Applicant welcomes acknowledgement of coordination and communication already undertaken among stakeholders.	Agreed

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3.2.7	<p>Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-076]</p> <p>Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035]</p>	<p>Communications during construction phase – Concurrent RAM activities</p>	<p>The Consultee requested notice to mariners to define what areas the marine survey vessels will be working in and on what days so the MCA can work with PLA and Harwich to manage other vessel traffic.</p> <p>The Consultee was asked if it had a preference for how to deal with notice and communication to mariners. The Consultee confirmed updates on a daily basis to help MCA plan movement would be helpful.</p> <p>Given the complex traffic movements in the Sunk VTS area, applicant must provide clear intentions and communications from the installation vessel on a daily basis, and all coordination must be detailed in the VMP and the NIP.</p> <p>Construction and installation activities for Sea Link <u>should not coincide</u> with those of the Five Estuaries and North Falls Offshore Windfarm projects (and other future projects) to avoid cumulative impacts and navigational risks.</p> <p>No activities involving vessels Restricted in Ability to Manoeuvre (RAM) should run concurrently with activities involving RAM vessels planned by the Five Estuaries and North Falls project developers in the SUNK area (or other future projects). This is mainly near the SUNK Pilot Boarding Ground (PBG).</p> <p>No project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility is below nautical 2 miles.</p> <p>Sea Link has not yet provided any evidence which confirm they are legally bound by the Five Estuaries and North Falls DCO. The MCA would expect Sea Link project to not start RAM ops if another RAM vessel were in that area and the only potential conflict is likely to be if Sea Link were actually carrying out cable lay operations and a RAM vessel from the other two projects join. The MCA is currently seeking legal advice here.</p> <p>It should also be noted that the position in respect of Five Estuaries and North Falls in not yet fixed. The latter DCO application hasn't yet been determined. For the former, whilst the outline NIP is certified by the DCO, the dML in Schedule 11 provides that the final NIP will still need to be approved by the MMO, following consultation with the MCA, in so far as it affects the Deep Water Routes (see para. 22 of the dML). The final NIP</p>	<p>The Applicant agrees on the importance of a robust NIP. Regarding a VMP, please see the Applicant's position on item 3.2.3 above.</p> <p>Coordination / Communication / NIP / NtM</p> <p>The Applicant acknowledged the importance of maintaining effective communication with relevant stakeholders throughout the construction phase of the Sea Link Project. In response to requests for clear and timely updates during this period, the Applicant has incorporated communication protocols into its construction planning.</p> <p>To support this commitment, a Navigation Installation Plan (NIP) has been developed following the submission of the Development Consent Order (DCO) application. The NIP will serve as a key mechanism for disseminating information to mariners and other stakeholders regarding navigational considerations during construction.</p> <p>A draft Outline NIP was submitted to the Planning Inspectorate (PINS) on 1 September 2025 (see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104]), as part of the Applicant's response to the Examining Authority's Section 89(3) letter dated 5 August 2025. Regarding a VMP, please see the Applicant's position on item 3.2.3 above.</p> <p>Cumulative impacts with other projects have been assessed within Application Document 4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-041]-Coordination with VE & NF / RAM SIMOPS</p> <p>The Applicant notes the requirement to avoid RAM SIMOPS with the Five Estuaries and North Falls developments. The NIP (see Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-076]) establishes the 'Concurrent Activity Areas' within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments, as agreed with the MCA, the ports stakeholders and in alignment with the North Falls and Five Estuaries oNIPs.</p> <p>Additionally at Deadline 6 the Applicant has added two further "in combination" Concurrent RAM Activity Areas to further manage shipping and navigation impacts within the MCA's highlighted area of concern for concurrent RAM,</p>	<p>Agreed. Under discussion</p>

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		<p>needs to accord with the principles set out in the outline NIP, but this doesn't mean that the final version can't differ providing that difference still accords with the principles. Such changes are envisaged in the outline NIPS for both schemes, which states that "Vessels and activities associated with the [the other two developments] may be included in a future version of the NIP post consent, depending upon the respective timelines for the construction and operation of North Falls, Five Estuaries and Sea Link." Therefore, there is further scope for refining communications between the three developments to ensure a coordinated approach.</p>	<p>See MCA updated position below</p>	<p>which area displayed on Plate 3.1 of the NIP and as described in section 3.3 of the NIP.</p> <p>The oNIP legally secures the Project's RAM SIMOPs commitments. These commitments are secured in the Outline Navigation and Installation Plan [REP4-076] under Condition 4 of the dDML</p> <p>[Add section on how oNIP legally secures]</p> <p>The Applicant will aim to avoid RAM activities within the Sunk area when visibility is below 2 NM. agrees in principle to stop ops for RAM operations in visibilities of less than 2 Nautical Miles within the Sunk region (KP 35 – KP 50), unless otherwise agreed to or advised by Sunk VTS. This will be discussed further, defined, and agreed in the HAZOP workshop. The HAZOP workshop should have representatives from the construction vessels present. -This mitigation is captured within Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035] Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-076].</p> <p>Further to the above, the Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] was submitted at Deadline 4 in consideration of the MCA's feedback and is secured within the deemed Marine Licence (dML) under Condition 4.</p> <p>Following on from our call 02 March 2026, the Applicant has updated Plate 3.1xx and the associated restrictions in Section 3.3xx of the Sea Link NIP to align with the concurrent activity areas and associated restrictions set out in the North Falls and Five Estuaries NIPs. is reviewing the current agreement mechanisms which it has in place with Five Estuaries and North Falls in addition to the NIP outlined above with regards to concurrent RAM operations.</p> <p>Considering the above, Aand as the MCA notes, both North Falls and Five Estuaries are obliged to adhere to the concurrent RAM activity areas specified within their NIPs as being secured within each DCO, and likewise Sea Link is obliged to adhere to the concurrent RAM activity areas shown within the Sea Link NIP and secured in the Sea Link DCO. The Applicant confirms that it has been in regular conversation with Five Estuaries and North Falls.</p>	

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3.2.8	Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-076]	New MCA Areas of Interest, Dec 2025	<p>The Consultee has provided the applicant with MCA's area of interest (AOI) for safeguarded 22m water depth, and the AOI for concurrent RAM and Restricted Visibility Stop Ops.</p> <p>The MCA's position remains as per written response and as presented at the meeting on 16 January 2026. No activities involving vessels Restricted in Ability to Manoeuvre (RAM) should run concurrently with activities involving RAM vessels planned by the Five Estuaries and North Falls project developers from KP 33 – KP 50 (as per box on image below). And no project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility is below nautical 2 miles.</p>	<p><u>Cumulative impacts with other projects have been assessed within Application Document 4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011].</u></p> <p>The Consultee has sent the Applicant four additional areas of interest <u>in December 2025</u>, as follows:</p> <ol style="list-style-type: none"> An extended area of safeguarded depth to 22 m (with 0.5 m over dredge) in the Sunk Pilot Boarding area, extending between KP 33 to KP 45. This is to include areas closer to the Sunk Deep Water Anchorage as well. An extended area of avoiding concurrent RAM activities, from between KP 35 to Sunk Centre, to avoid SIMOPS with Five Estuaries and North Falls within the SUNK Outer Precautionary area where cable crossings are expected. The Restricted Visibility Stop Operation should be applied to the entire Sunk area KP 33 to KP 50. The MCA disagrees with the PLA and states that they believe 12.5 m safeguarding is not sufficient for the "Long Sand Head Two-Way Route Crossing area". The MCA establish an extended area including and beyond the Long Sand Head Two-Way Route Crossing area, within which the MCA will need more information and further consultation if there is <u>any</u> depth reduction, between KP 45 to KP85. <p>The Applicant sought further clarity from the MCA on these new areas, which were substantially larger and more restrictive in their requirements than those which the Applicant and ports stakeholders have been collaborating on, and on which the Applicant and ports stakeholders have previously reached agreement. The Applicant discussed this matter at a meeting with the MCA arranged on 16 January 2026.</p> <p>The Applicant confirms that following the meeting on the 16 January 2026, clarity was provided from the MCA with regards to their Areas of Interest, <u>as detailed below</u>.</p> <p><u>Safeguarding depths</u></p> <p>The Consultee <u>clarified that their position is that they</u> would like the 5% maximum depth reduction to apply outside of the</p>	Under discussion



The MCA has clarified this to the project team on 2nd March that at KP 33-38 there should be no depth reduction as per CBRA due to the proximity of the Deep Water anchorage, and at KP38-KP44 the ports' 22m requirement applies. The 5% applies to the whole cable route outside of any agreed safe guarded depths, whichever provides maximum depth. There is no conflict therefore with the port's requirements.

The applicant has confirmed via email on 27 April that in the oNIP updated for deadline 7, it will now state that the area being specified for simultaneous RAM activities and during reduced visibility is KP 35 to KP 50, aligning with the MCA square

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			<p><u>visibilities stop ops area. The oNIP wording at D7 is the expected to be the following:</u></p> <p><u>Para 3.4.4 The Project agrees in principle to stop ops for RAM operations in visibilities of less than 2 Nautical Miles within the Sunk region (KP 35 – KP 50), unless otherwise agreed to or advised by Sunk VTS. This will be discussed further, defined, and agreed in the HAZOP workshop. The HAZOP workshop should have representatives from the construction vessels present.</u></p> <p><u>On the understanding that this is included in the updated NIP, and in accordance with plate 3.1, the MCA would be content. The MCA do not currently have the D7 updated NIP to confirm this but trust it will be included with clarity on the MCA defined areas for simultaneous RAM operations and during restricted visibility.</u></p> <p><u>5% maximum depth reduction</u></p> <p><u>With regards to Item 28 in the Schedule of ExA's recommended amendments to the applicant's dDCO submitted at deadline 6 [REP6-004]. The MCA has discussed and agreed the following wording with the PLA, in consultation with London Gateway:</u></p> <p><u>Condition 4(5) In undertaking the licensed activities,</u></p> <p><u>(i) within the Areas of Safeguarded Water Depths the undertaker must not reduce existing water depths by more than 5% of navigable depth referenced to Chart Datum or below the depths required by Requirement 17 in Schedule 3 (whichever results in the greatest water depth); and</u></p> <p><u>(ii) outside these areas, the undertaker may not reduce existing depths by more than 5% of navigable depth referenced to Chart Datum unless the MMO agrees a depth greater than 5% in writing in consultation with the MCA and Trinity House.</u></p> <p><u>Condition 12 (3) In undertaking activities under condition 12(2)</u></p> <p><u>(i) within the Areas of Safeguarded Water Depths the undertaker must not reduce existing water depths by more than 5% of navigable depth referenced to Chart Datum or below the depths required by Requirement 17 in Schedule 3 (whichever results in the greatest water depth); and</u></p> <p><u>(ii) outside these areas, the undertaker may not reduce existing depths by more than 5% of navigable depth by reference to Chart</u></p>	<p>port's 22_m safeguarded depth at the Sunk, <u>and across the Long Sand Head Two-Way Route region (KP 45-85)</u>. The Applicant confirms that this is currently secured as Condition 4(6) within the deemed Marine Licence and is applicable to the whole Offshore Scheme and not just the Areas of Interest identified by the MCA.</p> <p><u>Additionally, the Consultee has clarified that their position is that there should be no depth reduction between KP33-38. The Applicant has secured this in the DCO dDML part 2 Schedule 16. Please see reference 3.2.9 for further detail on this commitment.</u></p> <p>Further to the above, the Applicant confirms that an update to Application Document 9.12 (B) Outline Navigation and Installation Plan was submitted at Deadline 4 [REP4-076] in consideration of the MCA's feedback <u>was undertaken</u> and is secured within the deemed Marine Licence (dML) under Condition 4.</p> <p><u>Concurrent RAM activity areas</u></p> <p>The Applicant takes the view that the Proposed Project's Outline Navigation and Installation Plan is the appropriate place to secure the matter of concurrent Restricted in Ability to Manoeuvre (RAM) operations, and this aligns with the approach taken in the Five Estuaries and North Falls DCO applications, as they secure this matter within their NIPs.</p> <p>The Proposed Project's Outline Navigation and Installation Plan contains a figure which shows the Sea Link "<u>Sunk Pilotage Concurrent RAM Activity Area</u>" (Plate 3.1) which has been agreed with Port of London Authority (PLA) Harwich Haven (HHA) and the Sunk VTS / Maritime Coastguard Agency (MCA), Trinity House, Five Estuaries and North Falls during a face to face workshop led by Five Estuaries on 14 June 2024.</p> <p>This agreed area also aligns with the Concurrent RAM Activity Areas defined within the Five Estuaries and North Falls NIPs. The Applicant has identified these two developments as the two developments which have the possibility of their construction programmes overlapping temporally with the Sea Link construction programme. The Applicant is concerned that a deviation from this previously agreed area between parties would leave them liable to breaching dML conditions if other parties were not held to the same area restrictions.</p>	

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		<p><u><i>Datum unless the MMO, the PLA, London Gateway Port Limited, MCA and Trinity House all agree to the additional reduction.</i></u></p>		<p>The Applicant had established in discussion with Harwich Haven Authority and Port of London Authority that the Proposed Project should align with the Five Estuaries and North Falls projects' "Sunk Pilotage Concurrent RAM Activity Area" which is shown in each of their NIP respective documents.</p> <p>This would ensure agreement amongst the three developments, and clarity amongst all stakeholders (ports and developers), of a common agreed area where simultaneous RAM operations between any of the three developments should be avoided.</p> <p><u>Additionally at Deadline 6 the Applicant has added two further "in combination" Concurrent RAM Activity Areas to further manage shipping and navigation impacts within the MCA's highlighted area of concern for concurrent RAM, which area displayed on Plate 3.1 of the NIP and as described in section 3.3 of the NIP.</u></p> <p>Following on from our call 02 March 2026, the Applicant is reviewing the current agreement mechanisms which it has in place with Five Estuaries and North Falls in addition to the NIP outlined above with regards to concurrent RAM operations.</p> <p><u>The Applicant confirms that it has been in regular conversation with Five Estuaries and North Falls to ensure alignment, close understanding and collaboration between the three developments.</u></p> <p><u>Visibility stop ops</u></p> <p><u>The Applicant confirms that at Deadline 6, its position on weather constraints were outlined in the oNIP:-</u></p> <p><u>Agreement on weather forecasting data sources to be implemented will be discussed at the HAZOP workshop.</u></p> <p><u>3.4.2 The HAZOP workshop will also define weather limits, and associated risks to project vessel and/ or third-party vessel operations, including visibility thresholds (2 Nautical Miles).</u></p> <p><u>The Applicant is also including the following at Deadline 7:</u></p> <p><u>The Project agrees in principle to stop ops for RAM operations in visibilities of less than 2 Nautical Miles within the Sunk region (KP 35 – KP 50), unless otherwise agreed</u></p>	

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				<i>to or advised by Sunk VTS. This will be discussed further, defined, and agreed in the HAZOP workshop. The HAZOP workshop should have representatives from the construction vessels present.</i>	
3.2.9	N/A	Sunk deep water anchorage	<p>The Consultee noted proximity to sunk deep water anchorage – there is potential that if a vessel dragged an anchor, they may damage the Sea Link cable.</p> <p><u>The MCA welcomes the additional wording in the DCO dDML part 2 Schedule 16 to secure this. KP33-38 which falls outside the Area of Safeguarded Water Depth and is near the SUNK DW anchorage. The MCA believes the existing water depth here should not be changed.</u></p> <p><u>The reference to KP33 – 38 should therefore remain within the DCO dDML in order to safe guard navigable depth and preventing anchor strikes by deep draught vessels in the vicinity the SUNK DW anchorage.</u></p>	<p>The Applicant has considered this risk and will mitigate this risk as far as possible, through development of the Cable Burial Risk Assessment. An initial draft has been submitted to PINS in October 2025.</p> <p>The Applicant confirms that it is reviewing Condition 4-(1)(a) of the dML to state that the CSIP must be informed by a cable burial risk assessment. This will be <u>was</u> updated in the dDCO/dDML to be submitted at Deadline 5 <u>in Application Document 3.1 (H) draft Development Consent Order [REP5-005].</u></p> <p><u>The Applicant confirms that it notes the MCA's concern regarding this area, and has secured in the DCO dDML part 2 Schedule 16 "no depth reduction" along KP 33 to KP 38 of the Sea Link cable route:</u></p> <p><u>4. (6) In undertaking the licensed activities, the undertaker must not reduce existing water depths between KP 33 and KP 38 unless agreed with the MMO in writing in consultation with the MCA and Trinity House.</u></p>	Agreed Under discussion
3.2.10	N/A	Future project engagement	<p>Future project engagement at pre-application stage and on-going throughout the progress of the Proposed Project suggestions:</p> <p>The Consultee suggested that National Grid engage with the UK Harbour Masters Association (UKMA) SE coast committee.</p> <p>The Consultee suggested that National Grid engage with the Sunk VTS users' group (meet every 6 months).</p>	<p>The Applicant is considering the feasibility of updating stakeholders within these groups. The Applicant attended a Sunk User Group meeting to provide project update on 14th January 2025 and also in January 2026.</p> <p>The Applicant notes the importance of communication and commits to producing a Navigation Installation Plan (NIP) post-DCO submission, which will provide this mechanism for ensuring communication and collaboration with shipping and navigation stakeholders. The Applicant has 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. (see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104]).</p> <p>Further to the above, the Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] was submitted at Deadline 4 which is secured within the deemed Marine Licence (dML) under Condition 4.</p>	Agreed Under discussion

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3.2.11	<p>Application Document 9.83 (A) Code of Construction Practice [REP3-076]</p> <p>Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]</p> <p>Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]</p>	<p>Cable depth and other projects</p>	<p>The Consultee confirmed the cable (and any covering material e.g. rock armour) must be at <u>least 22 metres</u> below Chart Datum in the vicinity of the Deep-Water (DW) Route and DW Anchorage to allow future vessels with a draught of 20 metres. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met and secured in the DCO.</p> <p>The Consultee confirmed through conversations with other projects and the PLA, they understand there may be plans to dredge (14-16 m), therefore any cable would have to be buried deeper. Other two projects have also got cable route through the inner precautionary area, which could result in a change in cable depth or possible rerouting of cable. Therefore, with robust vessel management plans in place it is possible to undertake cable activities in this area (precautionary area). The Consultee confirmed this would help make sure the route is clear for inbound and outbound details.</p>	<p>The Applicant agrees with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities (PLA, HHA and LGPL) and described in Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038].</p> <p>The Applicant can confirm that it has been in discussion with the Port of London Authority and received the Area of Safeguarded Depth "Sunk Pilot Boarding area", where 22 m below Chart Datum is required to be preserved and to ensure that dredging in the relevant parts of the PLA's "Sunk Pilot Boarding area" can proceed to a depth of 22 m below CD. This area has also been agreed with Harwich Haven Authority and London Gateway Port. However, this agreed area does not include the immediate vicinity of the Sunk Deep Water Anchorage between KP 33 and KP 38, where depths are already shallower than the 22 m CD safeguard level and where the port authorities have confirmed there are no future plans to dredge to 22 m below Chart Datum. As discussed below the Applicant can confirm that proposed cable installation and protection methodology would preserve existing water depth within this region of the cable route.</p> <p>In the vicinity of the Sunk Deep Water Anchorage, the Applicant can confirm that the methodology for protecting the cable is by lowering the cable below the seabed to the proposed Target Depth of Lowering (TDOL) within a cable trench (2 m to 2.5 m) in accordance with the Applicants Cable Burial Risk Assessment (see Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]). The trench along part of this high-risk section – specifically KP 38 to KP 58 – is proposed to be backfilled using rock to a level 20% below the original seabed level. There are no in-service or planned cable assets that cross the Offshore Scheme in the vicinity of the Sunk Deep Water Anchorage. The proposed cable installation and protection methodology would preserve existing water depth within this region of the cable route. The Applicant confirms that it notes the MCA's concern regarding this area, and has secured in the DCO DdML part 2 Schedule 16 "no depth reduction" along KP 33 to KP 38 of the Sea Link cable route:</p> <p><i>4. (6) In undertaking the licensed activities, the undertaker must not reduce existing water depths between KP 33 and</i></p>	<p>Agreed Under discussion</p>

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				<p><u>KP 38 unless agreed with the MMO in writing in consultation with the MCA and Trinity House.</u></p> <p>Regarding Deep Water Routes, the Applicant can confirm that unlike the Five Estuaries and North Falls projects, the Sea Link cable route will not interact with the deep water routes 'Sunk Deep Water Route' or 'Trinity Deep Water Route'.</p> <p>The Applicant noted that robust vessel management plans, as described in Application Document 9.83 (A) Code of Construction Practice [REP3-076], would be needed during cable installation activities. The Applicant has produced a Navigation Installation Plan (NIP) to provide this management and communication plan. The Applicant has 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. <u>(see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104]).</u></p> <p>Further to the above, the Applicant confirms that Application Document 9.104 Areas of Safeguarded Water Depth Plan [REP4-098] was submitted at Deadline 4. The Applicant also confirms that Application Document 9.92 Cable Specification and Installation Plan [REP4-090] was also submitted at Deadline 4 which <u>and</u> is secured within the deemed Marine Licence (dML) under Condition 4.</p> <p>In addition to this, the Applicant has also included a bespoke DCO Requirement in its submission at Deadline 5 with regards to Safeguarding Future Water Depths.</p> <p>The Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] was submitted at Deadline 4 which <u>and</u> is secured within the deemed Marine Licence (dML).</p> <p>The Applicant also confirms that it is reviewing comments received at Deadline 4 from the MCA with regards to the NIP following on from our call 02 March 2026.</p>	

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
3.2.12	N/A	Navigation Installation Plan (NIP)	<p>Full consultation on the Navigation Installation Plan (NIP) is essential. Given the complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital. The NIP must be discussed and agreed with the PLA, Harwich Haven Authority (HHA), Medway Port, and the MCA.</p> <p><u>The MCA confirms we are content that the additional areas have been included in the NIP as per our request and this document now addresses our concern.</u></p>	<p>The Applicant has submitted a draft Outline NIP to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025 (see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104]). The Applicant will continue to engage with the key shipping and navigation stakeholders, including the Consultee, PLA, HHA and others to update and refine the Outline NIP through the pre-Examination and Examination phases.</p> <p>The Applicant wishes to keep the list of Interested Parties as streamlined as possible while including the key relevant stakeholders. The Applicant wishes to be able to update the NIP swiftly, as required, in order to get information out in a timely manner up to and throughout the construction phase. It therefore seeks to limit the list of Interested Parties to only those which overlap with our Areas of Interest, including other offshore developments which may be in construction at a similar timeline through the Sunk region, and those parties identified through consultation as expressing a need for enhanced communication through the consultation phase. Medway Port does not overlap with our NIP Areas of Interest, therefore has not been added as an Interested Party. National Grid most recently engaged with Medway in October 2025 who confirmed and agreed with this approach.</p> <p>The Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] was submitted at Deadline 4 which and is secured within the deemed Marine Licence (dDML).</p> <p>The Applicant also confirms that it is reviewing comments received at Deadline 4 from the MCA with regards to the NIP following on from our call 02 March 2026, and provided an updated version of the NIP at Deadline 5. <u>After further engagement with the MCA the Applicant has also incorporated additional MCA feedback to the NIP at Deadline 6 into Application Document 9.12 (C) Outline Navigation and Installation Plan [REP6-099].</u></p>	Agreed Under discussion
3.2.13	Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035]	Cumulative Impacts / Simultaneous Operations	<p>Construction and installation activities for Sea Link should not coincide with those of the Five Estuaries and North Falls Offshore Windfarm projects to avoid cumulative impacts and navigational risks. The applicant must work with the relevant ports, VTS and offshore developers to coordinate activity and address this issue. Any simultaneous activities (including survey ops) with vessels on</p>	<p>The Applicant notes the requirement to avoid RAM SIMOPS with the Five Estuaries and North Falls developments.</p> <p>The Applicant has produced a communication protocol in the form of an NIP to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key Project phases, in particular</p>	Agreed Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	MCA Current Position	The Applicant's Current Position	Status
			Restricted in Ability to Manoeuvre (RAM) status near the SUNK Pilot Boarding Ground (PBG), particularly to the east of the PBG should be avoided.	<p>the construction phase. This is noted in Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035]. The NIP also establishes the “Concurrent Activity Area” within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025 (see Application Document Applicant's response to the ExA's s89(3) letter 8 July 2025 & 5 August 2025 – 9.12 Outline Navigation and Installation Plan [AS-104]).</p> <p>The Applicant confirms that an update to Application Document 9.12 Outline Navigation and Installation Plan [REP4-076] which is secured within the deemed Marine Licence (dML).</p> <p>The Applicants position on concurrent RAM activity is outlined above in 3.2.7.</p>	
3.2.14 Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048]	Future Vessel Draught Considerations	With vessels potentially reaching draughts of up to 20 m, Harwich Haven Authority (HHA) recommends that the cable and any protective materials (e.g., rock armour) to be a minimum of 22 m below Chart Datum. The MCA fully supports this recommendation to future-proof navigational safety.	<p>Concerns surrounding under-keel clearance are noted in Section 7.6 of Application Document 6.3.4.7.A (C) ES Appendix 4.7.A Navigational Risk Assessment [REP4-048].</p> <p>In line with MCA guidance, any anticipated areas where reductions in water depth may be greater than 5% will be discussed with the MCA and also relevant stakeholders including port and harbour authorities as required.</p> <p>Regarding the requirement to preserve 22 m below chart datum, please see item 3.2.11 above.</p> <p>The Applicant confirms that following the meeting on the 16 January 2026, clarity was provided from the MCA with regards to their Areas of Interest. The Consultee would like the 5% maximum depth reduction to apply regardless of the port's 22 m depth requirement in the “Sunk Pilot Boarding Area” Area of Safeguarded Depth. The Applicant confirms that this is currently secured as Condition 4(6) within the deemed Marine Licence and is applicable to the whole Offshore Scheme and not just the Areas of Interest identified by the MCA.</p> <p>The Applicant confirms that it is currently reviewing this condition in light of discussions on 02 March 2026 for the MCA interest areas between KP 33 and KP 38 where by no</p>	Agreed Under discussion	

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				<p>reduction in current water depth should occur. An update will be provided at Deadline 5</p> <p><u>Please see above references 3.2.2 and 3.2.11 for further detail regarding safeguarding water depths.</u></p>	
3.2.15	<p>Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]</p> <p>Application Document 6.2.1.4 (D) Description of the Proposed Project [REP1A-003]</p>	Electromagnetic deviation	<p>The MCA has reviewed the Electric and Magnetic Field Compliance Report for the Sea Link HVDC cable. We confirm that the offshore section complies with our requirements; less than 3° deviation for 95% of the route and less than 5° for the remaining 5%, as detailed in Table 5.2 of the report.</p> <p>In nearshore areas where the cables are separated by 45 m and buried to a depth of 10m (approximately 2.435 km in total—1.524 km along the Suffolk coast and 0.911 km in Pegwell Bay), no detailed electromagnetic field (EMF) assessment has been provided. While this segment represents only 2 % of the total route and vessel traffic is mostly perpendicular (minimising interaction), the separation may result in compass deviations exceeding 5°.</p> <p>Although the navigational impact is expected to be minimal, the MCA requests that the project team ensure maximum burial depth throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation. Should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.</p>	<p>The Applicant notes the Consultee's request that the maximum burial depth be used throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation.</p> <p>The Applicant notes the Consultee's request that should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.</p> <p>The Applicant confirms an initial high-level assessment has been undertaken in response to this comment in the MCA Relevant Representation and are confident they can meet the Consultee's requirements in this area. A full update to the EMF report will be carried out pre-construction and will be shared with the Consultee at the earliest opportunity.</p>	<u>Agreed Under discussion</u>

4. Approvals

Signed



On Behalf of

National Grid

Name



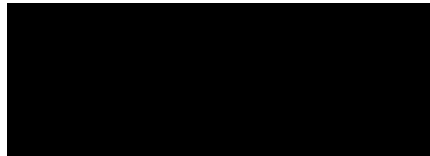
Position

[Senior Consent Officer](#)

Date

[29/04/26](#)

Signed



On Behalf of

Maritime and Coastguard Agency

Name



Position

[Marine Licensing and Offshore Consenting Manager](#)

Date

[29/04/26](#)

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>

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