The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

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1. Introduction

1.1 Background

1.1.1 This Outline Fisheries Liaison and Coexistence Plan (FLCP) has been prepared for the Sea Link Project Offshore Scheme.

1.1.2 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) 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.

1.1.3 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.1.4 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.

1.1.5 National Grid 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."*

1.1.6 The Proposed Project includes the Offshore Scheme, which is a subsea HVDC cable across the outer Thames region of the southern North Sea, linking Suffolk to Kent. The Offshore Scheme includes three distinct components: the Suffolk landfall at Aldeburgh, the marine HVDC cable and the Kent landfall at Pegwell Bay.

Purpose and Objectives of this Outline FLCP

1.1.7 This outline FLCP sets out the principles with which the final FLCP must accord. The CSIP will be submitted for approval by the Marine Management Organisation (MMO) and is secured via condition of the Deemed Marine Licence in Schedule 16 of the draft Development Consent Order (DCO).

1.1.8 This FLCP pertains to the elements of the Proposed Project which are seaward of Mean High Water Springs (MHWS).

1.1.9 The purpose of this document is to facilitate a positive approach to coexistence of the Proposed Project and local existing commercial fishing interests and provides an outline of the approach to fisheries liaison during the construction, operational and decommissioning phases.

1.1.10 This Outline FLCP aims to document and demonstrate how National Grid will liaise and coexist with the commercial fishing industry and deliver commitments to mitigation made in the Proposed Project Development Consent Order (DCO) Application, which are intended to avoid or reduce potential impacts on the fishing industry.

1.1.11 This Outline FLCP has been drafted to be applicable to, and active during, all phases of the Proposed Project through construction, operation and maintenance, and decommissioning. Where mitigations or measures are only relevant to a particular phase, this will be clearly stated.

1.2 The Proposed Project

1.2.1 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

1.2.2 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 (2 m allowance for ground level rise plus 26 m converter station) 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.

1.2.3 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.

1.2.4 This document is applicable to the Offshore Scheme.

1.3 Location

1.3.1 The proposed bundled marine HVDC cables would be routed from the TJB at the Suffolk landfall located at Aldeburgh and the TJB at the Kent landfall at located within Pegwell Bay to the south of the settlement of Cliffsend.

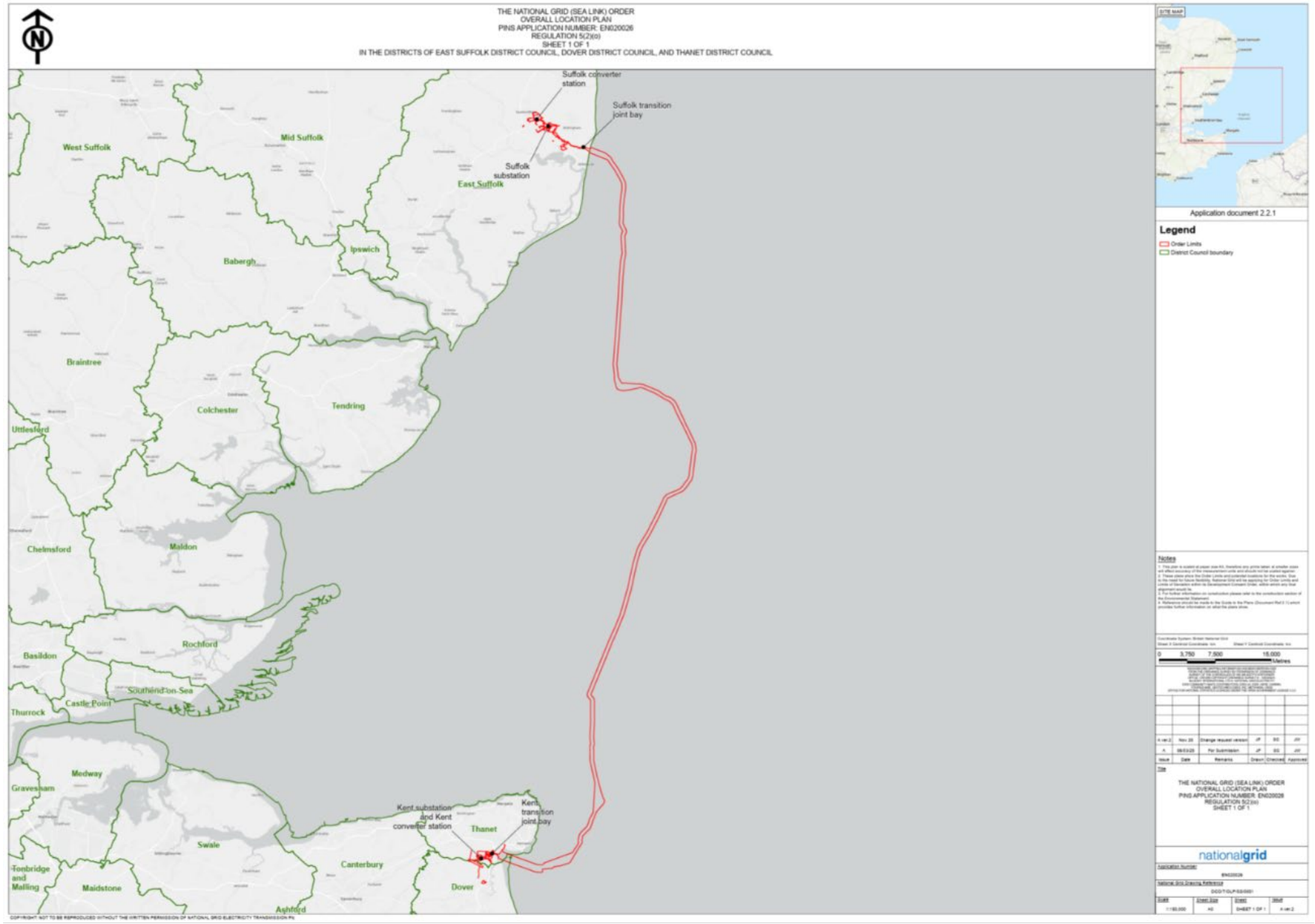

Plate 1.1: Plan showing location of Proposed Project and Offshore Scheme.

1.4 Relevant Guidance

1.4.1 The final FLCP, as outlined in this document, will be developed with reference to the following key guidance and information, which outline best national and international practices for engagement with the commercial fishing industry to date including:

- Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Offshore Renewable Developments: Recommendations for Fisheries Liaison (FLOWW, 2014);
- FLOWW Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments (FLOWW, 2025);
- FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds (FLOWW, 2015);
- Code of Practice on Interaction with Static Gear Fisheries, United Kingdom Offshore Operators Association (UKOOA, 2006);
- The European Subsea Cable Association (ESCA) Guideline 01 - Fishing Liaison (ESCA, 2018);
- The Mariner's Handbook (NP100) (UKHO, 2024) – Section 9.45 Submarine Cables.
- Direct liaison undertaken to date with individual fishermen, vessel owners and landing agents.

1.4.2 National Grid has also considered practices of other offshore developers in the Southern Norh Sea along with own experience of developing a fisheries liaison and coexistence strategy which minimises disruption on fisheries stakeholders.

1.5 National Grid's Approach to Fisheries Engagement

1.5.1 The development of the Proposed Project is being led by National Grid, an Applicant with a portfolio of subsea interconnectors in which they are working towards developing a consistent approach to fisheries engagement.

1.5.2 As part of the final FLCP, National Grid assumes that any feedback received (and the feedback acted upon) from individual fishers and from fisheries organisations is open, truthful and constructive.

1.5.3 National Grid appreciates the value (social, cultural, and economic) of the fishing industry and acknowledges the spatial squeeze this historic and culturally important sector faces from the increasing number of offshore industries. Consequently, National Grid is dedicated to contributing to the establishment of, and loyally complying with existing, best practice principles and guidelines (as outlined in Section 1.3) while also working towards a portfolio approach and ensuring that the suitability of mitigation efforts and measures are considered in the context of the Proposed Project.

1.5.4 National Grid values local fisheries knowledge and experience and will endeavour to take a flexible approach to engagement with fishers, working with stakeholders to understand which engagement methods (format of engagement, frequency of engagement, etc.) may be the most effective.

1.5.5 National Grid's ambitions to minimise impacts on fisheries, maximise opportunities for coexistence and collocation and ensure fair treatment of all parties is embedded in this Outline FLCP which is structured to meet the requirements of the dML.

2. Proposed Project Fisheries Overview

2.1 Fishing Activity within the Offshore Scheme

2.1.1 This Outline FLCP has been informed by data collected to support **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [REP1-007]** and **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]**.

2.1.2 The surveillance sightings data suggest varying levels of presence of UK and non-UK vessels using different gear types in the vicinity of the Proposed Project. The vast majority of observations were of UK vessels (80.07%). These were concentrated in ICES rectangles 31F1 and 32F1, in the central and southern sections of the Offshore Scheme, within the 6 NM limit.

2.1.3 Surveillance sightings for all vessels, UK and international boats, show that within the vicinity of the Proposed Project, most vessels were trawlers (40.45%, comprising demersal stern, beam, and all other trawlers), and potters/whelkers (20.98%). The remaining gear types comprised gill and drift nets (14.59%), dredgers (9.48%), rod and line (8.83%), and seiners (2.04%).

2.2 Fisheries Stakeholders and Engagement

2.2.1 National Grid has undertaken statutory and non-statutory consultation with fisheries stakeholders in relation to the Proposed Project. A summary of consultation prior to the DCO application is provided in **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [REP1-007]**.

2.2.2 A summary of the consultation undertaken is given in Table 2.1 an will be maintained throughout all project phases.

Table 2.1: Summary of Consultation

Consultees	Role/organisation	Consultation date (start and end date)
Fisher 1	Felixstowe Ferry Fishermen's Association	21/03/23 - 21/03/2023 (first contact through FFFA - James White)
Fishers 2 and 3	Aldeburgh Fishing Association	08/02/2023 – 29/03/2023
Fisher 4	Orford and District Fishermen's Association	08/02/2023 - 13/03/2023
Fishers 5 and 6	Whitstable Fishing Association	08/02/2023 – 29/03/2023
Fisher 7	Felixstowe Ferry Fishermen's Association (FFFA)	08/02/2023 - 01/03/2023

Consultees	Role/organisation	Consultation date (start and end date)
Fisher 8	Lowestoft Fishermen's Association	23/02/2023 - 29/03/2023
Fisher 9	Southwold Fishermen's Association	08/02/2023 - 24/02/2023
Meeting with FFFA members	Felixstowe Ferry Fishermen's Association	01/03/2023
Fisher 10	West Mersea Fishermen's Association	08/02/2023 – 29/03/2023
Fisher 11	Southwold Fishermen's Association	14/03/2023
Fisher 12	Felixstowe Ferry Fishermen's Association	13/03/2023
Visned	Visned (Dutch PO)	16/03/2023 – 29/03/2023
Fisher 13	Felixstowe Ferry Fishermen's Association	08/02/2023 - 28/02/2023
Rederscentrale	Rederscentrale (Belgian PO)	16/03/2023 – 29/03/2023
CRPMEM	CRPMEM (French PO)	16/03/2023 – 29/03/2023
Fishers 14, 15 and 16	Lowestoft Fishermen's Association	08/02/2023 – 29/02/2023
Fisher 17	Independent, Aldeburgh	08/02/2023 - 17/02/2023
Fisher 18	Southwold Fishermen's Association	08/02/2023 - 02/03/2023
Fisher 19	Lowestoft Fishermen's Association	08/02/2023 - 21/03/2023
Fisher 20	Thanet Fishermen's Association	08/02/2023 – 29/03/2023
Fisher 21	Orford and District Fishermen's Association	08/02/2023 - 21/02/2023
Fisher 22	Felixstowe Ferry Fishermen's Association	08/02/2023 - 02/03/2023
NFFO	NFFO	16/03/2023
Fishers 23 and 24	Independent, Sizewell	08/02/2023 - 21/02/2023
Fisher 25	Southwold Fishermen's Association	08/02/2023 - 13/03/2023
Fisher 26	Orford & District Fishermen's Association	08/02/2023 - 02/03/2023
Fisher 27	Southwold Fishermen's Association	08/02/2023 - 28/02/2023

Consultees	Role/organisation	Consultation date (start and end date)
Fisher 28	Southwold Fishermen's Association	08/02/2023 - 23/02/2023
Fisher 29	Southwold Fishermen's Association	08/02/2023 - 22/02/2023
Fisher 30	Southwold Fishermen's Association	08/02/2023 - 09/03/2023
Fisher 31	Lowestoft Fishermen's Association	08/02/2023 - 06/03/2023
Fisher 32	Lowestoft Fishermen's Association	08/02/2023 - 06/03/2023
Fisher 33	Harwich Haven Fishermen's Association	08/02/2023 – 29/03/2023
Eastern IFCA	Eastern Inshore Fishery and Conservation Authority	21/03/2023 – 29/03/2023
Kent & Essex IFCA	Kent & Essex Inshore Fishery and Conservation Authority	21/03/2023 – 29/03/2023

3. Fisheries Management and Liaison Strategy

3.1 Roles and Responsibilities

3.1.1 National Grid recognises that early and continuous engagement with the fishing industry is vital to building constructive working relationships and minimising disruption throughout the development process. Consistent with FLOWW (2025) guidance, the final FLCP will set out the proposed fishing liaison roles for the Proposed Project and clearly define their responsibilities.

National Grid

3.1.2 The primary responsibilities of National Grid in managing relationships and good liaison with the fishing industry are set out below:

- Progress the development of the Proposed Project with the least disturbance practicable to the local fishing operations and ensuring commitments outlined in the Final FLCP are adhered to;
- Maintain a Fisheries Liaison Officer throughout construction and decommissioning, and as required to support ongoing liaison needs.
- Provide timely, accurate information to the Fishing Industry Representatives (as required), and local fishermen to help prevent conflict and support safe working practices;
- Share detailed construction and scheduling information with the fishing community to enable forward planning and reduce potential interactions;
- Prepare and issue Notices to Mariners (NtMs) for circulation via the FLO/OFLO and ensure these are uploaded to Kingfisher to inform all mariners of relevant activities and hazards; and
- Identify and communicate standard transit routes for operation and maintenance activities to support safe navigation around the Proposed Project's infrastructure.

3.1.3 National Grid has also identified responsibilities and standards required of vessels under contract to them:

- All vessels should adhere to The International Regulations for Preventing Collisions at Sea 1972 (COLREGs) and observe the requirements of International Convention for the Safety of Life at Sea (SOLAS), 1974 (International Maritime Organisation (IMO), 1974).

Fisheries Liaison Officer

3.1.4 The Fisheries Liaison Officer (FLO) acts as the primary link between National Grid and the fishing industry, ensuring clear communication, early issue identification, and smooth coexistence throughout all project phases. Key responsibilities include:

- Serve as the direct and accessible contact for all fisheries stakeholders, providing timely responses and consistent engagement.
- Maintain a strong understanding of local and regional fisheries, including vessel activity, gear types, and seasonal patterns. Track fishing activity in and around the Proposed Project, identifying active vessels and skippers and highlighting potential interactions with project operations.
- Build and sustain positive working relationships with fishers, industry bodies, and associations, ensuring information flows openly and accurately.
- Gather fishermen's concerns, operational constraints, and coexistence sensitivities and relay them promptly and accurately to the Proposed Project team.
- Prepare and circulate project notices (such as timings of any temporary areas of exclusion from fishing grounds), updates, charts, and relevant operational information using communication methods suited to the stakeholder group.
- Organise, attend, and minute fisheries-related meetings, including coordination of working groups and stakeholder briefings.
- Maintain an up-to-date and comprehensive fisheries stakeholder database to support effective communication and record-keeping.

Offshore Fisheries Liaison Officer

3.1.5 Where appropriate, an Offshore Fisheries Liaison Officer (OFLO) would be utilised onboard survey and construction vessels for the Proposed Project as required. The primary responsibilities of the OFLO are:

- To regularly broadcast survey and construction vessel locations, operations, schedules, safety zones, advisory safe passing distances and health and safety requirements on relevant Very High Frequency (VHF) and Medium Frequency (MF) radio frequencies during operations;
- To maintain daily contact with fishing vessels observed to be within the vicinity of the work areas of survey and construction vessels and provide sufficient notice to enable the relocation of any static fishing gears present within the project vessels defined safety zones; and
- To keep the masters and watch officers of survey and construction vessels informed of fishing vessels in the vicinity of their vessels working area and the gears and modes of operation of such vessels.

Guidance for Fishers

3.1.6 The success of the FLCP in helping to ensure coexistence will require open and transparent communication between National Grid and the fishing industry and the support and engagement of both parties.

3.1.7 The Proposed Project will make every effort to minimise disturbance of fisheries stakeholders (based on the information received from them) and to provide accurate and timely information, it is requested, and expected, that the fishing community will take precautions and make efforts to minimise risks of conflict or interaction with infrastructure and working vessels and provide accurate information on the nature of fishing activity in locations of shared interest.

4. Fisheries Mitigation Strategy

4.1.1 An approach to avoiding and reducing impacts on both the commercial fishing and other developments in the area is considered to be the most sustainable approach to coexistence. It is the intention of National Grid to facilitate coexistence wherever possible during all phases of the Project, which will include the implementation of mitigation strategies, to minimise the overall impacts of the Project.

4.1.2 Advice within FLOWW (2014) has been duly considered while identifying suitable coexistence promoting procedures and mitigation measures. Though suitable procedures to facilitate coexistence may evolve through discussions with fisheries stakeholders and as construction plans for the Proposed Project become better defined, National Grid has identified and is willing to implement a variety of commitments so that successful coexistence and long-standing good relationships with fisheries stakeholders can be achieved.

4.2 Embedded Mitigation

4.2.1 As part of the project design process, a number of embedded mitigation measures are provided within **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** and summarised within Table 4.1.

Table 4.1 Embedded Mitigation and Control and Management Measures

ID	Measure Proposed
GM02	As-built locations of cable and external protection will be supplied to UKHO (Admiralty), The Crown Estate and Kingfisher (KIS-ORCA).
GM03	An offshore Construction Environmental Management Plan (CEMP) including an Emergency Spill Response Plan and Waste Management Plan, Marine Pollution Contingency Plan (MPCP), Shipboard Oil Pollution Emergency Plan (SOPEP) and a dropped objects procedure will be produced prior to installation.
GM04	Sensitive routeing and siting of infrastructure and temporary works.
LVS02	All project vessels must comply with the International Regulations for Preventing Collisions at Sea (1972) (IMO, 2019), regulations relating to International Convention for the Prevention of Pollution from Ships (the MARPOL Convention 73/78) (IMO, 2019) with the aim of preventing and minimising pollution from ships and the international Convention for the Safety of Life at Sea (SOLAS, 1974).
CF01	A Fisheries Liaison Officer (FLO) and fisheries working group(s) will be maintained throughout installation to ensure project information is effectively

ID	Measure Proposed
	disseminated, dialogue is maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season.
CF02	Timings of any temporary areas of exclusion from fishing grounds will be clearly communicated via a notice to mariners.
CF03	Berms will be installed where cable protection is necessary. These will be designed with a 1:3 profile and flat crests, intended to prevent the risk of fishing gears snagging.
CF04	A procedure for the claim of loss, damage, relocation or removal of fishing gear will be included in the Fisheries Liaison and Coexistence Plan (FLCP).
CF08	Minimising the amount of time the cable stays unprotected and exposed to potential interactions with anchoring vessels or fishing gear (anchor drag or gear snagging), during construction.
MPE02	For subtidal sections of the cable route, the minimum depth of lowering (DOL) to the top of the cable is 0.5 m (in areas of bedrock), with a target DOL for the Proposed Project approximately 1 m to 2.5 m, to be achieved where possible dependant on the seabed geology. At the Kent landfall, a target DOL of 1.5 m will apply to allow for the potential future lowering of the intertidal bed levels.
MPE03	Cable protection features (e.g. rock placement, mattresses and grout bags) will be installed only where considered necessary for the safe operation of the Proposed Project. This includes the repair of cables due to accidental damage.
SN01	A risk based burial approach will be used where cables will be buried to a minimum DOL to the top of the cable of 0.5 m (in areas of bedrock), with a target DOL for the Proposed Project of approximately 1 m to 2.5 m, assessing cable protection risk factors such as sediment type, shallow geology, sediment mobility, fishing activity, shipping movements and anchor deployment along the route.
SN02	Relevant information will be communicated to other sea users via Notices to Mariners (NtM), Radio Navigation Warnings Navigational Telex (NAVTEX) and/or broadcast warnings.
SN03	All Project vessels will display appropriate marks and lights and will always broadcast their status on AIS.
SN04	Temporary aids to navigation will be used as required to guide vessels around areas of installation activity.
SN05	A compass deviation report will be produced prior to installation.
OSU02	Timely and efficient communication will be given to sea users in the area via Notices to Mariners, Kingfisher Bulletins, NAVTEX and NAVAREA warnings.

4.3 Additional Mitigation

4.3.1 Additional Mitigation for the Proposed Project is listed within **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** and summarised within Table 4.2.

Table 4.2 Additional Mitigation

ID	Measure Proposed
CF05	Post installation surveys of the Offshore Scheme for depth of lowering and surveys of rock protection to check for snagging risk.
CF06	Procedures and process for ongoing consultation with fishers regarding cable protection design will be set out in the FLCP.
CF07	National Grid will maintain communications with other developments in the region with regard to respective installation timings and location. These communications will be communicated to fisheries through the FLCP.

4.3.2 Final mitigation measures will be outlined in full within the final FLCP in consideration of relevant Associations including Thanet Fisherman's Association and Whitstable Fishing Association.

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