

Thanet Fishermen's Association

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17.09.26

Your ref: EN020026

Our ref: RR-5373

Secretary of State for Energy Security and Net Zero

By email: SouthEastAngliaLink@planninginspectorate.gov.uk

Re: Application by National Grid Electricity Transmission plc for Development Consent for the proposed Sea Link project (EN020026). Request for information.

Dear Mr Wheadon,

Thank you for your letter, dated 28.08.26, requesting information from Thanet Fisherman's Association with regard to Commercial Fisheries and the Sea Link project.

Although we have registered with PIN's and are entering this comment from TFA, the continuous addition of offshore projects in the region has increased the pressure on the whole of the inshore Fishing industry within the Outer Thames who face the same attrition through loss of ground and industrialisation of the Outer Thames Estuary. There are nine voluntary Fishermen's Associations between Lowestoft and Ramsgate in the Outer Thames, the majority with declining fleets, all dealing with at least six offshore projects at any one time in an effort to defend fishing grounds and the Fishermen they represent.

We are not Naive to the fact that our input has very limited weight in influencing offshore projects. We cannot stop them, we cannot influence the grounds they route through, we cannot influence the seasons the surveys are done or when the cables are laid, we cannot change how we are engaged with and when, or the quality of that engagement. We cannot rely on impact assessments to assess our fisheries properly, nor mitigate the consequences when they are wrong. We are reliant upon the small milestones and mitigations the system has in place to try and safeguard what we can for the future of fishing and even then, we are often ignored.

We attend numerous meetings with Government agencies, developers and others which talk of coexistence and collocation with fisheries but in reality, that translates to fisheries changing where or how they work to 'adapt' to offshore projects. We are running out of the ability to adapt.

We think it is crucial that the Planning Inspectorate and the Secretary of State understand the importance of the consequences of continued offshore project

development in a saturated area without significant changes to consideration for fisheries and in the planning processes that we have been through for the last twenty years. We are not asking that all projects stop. We are asking for fair and reasonable treatment, supported by the planning process, of the oldest offshore stakeholder who is still reliant on the sea and the seabed.

Sea Link PEIR and Environmental Statement. Request for information.

TFA raised concerns with the PEIR for Sea Link in December 2023 and again with the Environmental Statement in June 2025.

The concerns and comments raised in our submission in June 2025 remain. If there have been alterations made to the Environmental Statement and any of our points acted upon, then we have not been made aware of those changes or commitments. We have had communication from the applicants Fisheries Liaison this year (2026) with regard to the Sea Link offshore survey, which is ongoing in our region now. We have had no additional engagement to discuss the points raised in the TFA submissions or the oFLCP.

The points of concern raised last June remain in place as below.

1. In response to the PEIR, TFA set out concerns, including comments on the collection of Kent data (which has resulted in almost no fishing data shown South of the Longsand), bottom drifting, cable crossings, cumulative impact and displacement. Point CF06 in the oFLCP is the only reference we can see to concerns around cable crossings.
2. The small amount of data shown in plate 8.22 of the commercial fisheries technical report, titled '**Fishing Grounds for Static nets as Identified Through Consultation**' does in fact show bottom drift grounds entered by Thanet Fishermen's Association. This is a significant error. Static gear works all across the cable route, but bottom drifts can only occur on specific clean ground.
3. We acknowledge that there are references to bottom drifting in the Environmental Statement, and there was improvement on the PEIR but do not think due consideration has been given to impacts on this method of fishing and the potential permanent loss of ground from cable crossings, cable protection or redundant cable cut ends. We note that permanent loss of ground has not been scoped in for assessment during any phase of the works (8.3.8), though permanent loss of ground is suggested at 8.9.73, predominantly relating to the presence of cable protection where the minimum DOL cannot be achieved.
4. If rock berms are used in drift ground, or depth of burial (DOL) is not achieved and rock protection is used, this will be a permanent loss of ground across an area larger than the footprint of the cable, and this is not recognised in the

Environmental Statement. The PEIR referred to up to 13.2km of external cable protection and that is a great deal of ground to lose if it is in the wrong place, so we welcome the consultation mentioned at 8.10.3, and mitigation CF06 within the oFLCP to discuss alternative cable protection methods.

5. We remain in disagreement with point 8.9.39 **‘Consultations with fishers have shown that a small proportion of netters use bottom drift nets which can touch the seabed. However, for the purpose of risk avoidance demersal netters are considered able to place their gear at variable depths, and therefore are adaptable during the construction phase’**. We are not aware that any TFA or Whitstable Fishermen were consulted on the bottom drift method. This highlights that this method is not properly understood and therefore has not been properly assessed. Bottom drift gear is in constant contact with the seabed and is not set at variable depths. Any obstruction on the seabed will interfere with bottom drifting and cannot be avoided, we therefore disagree with the assessment on sensitivity. There needs to be better understanding and consideration of this method in order to properly assess the impact on it.
6. We strongly disagree with the suggestion that fishing should not occur over cables and if this were the case, the inshore industry in the Outer Thames would be severely damaged. Please look at the number of cables in this region and consider the consequences of Sea Link, or others, stopping fishing over cables.
7. The commercial fisheries chapter in the ES repeatedly refers to a wide range of fishing grounds being available and the fishing vessels being more adaptable and versatile, in order to mitigate the magnitude and sensitivity of any effect on them. In reality, the increase in project numbers, ongoing maintenance, MPA's and other restrictions have seen the available grounds in the region greatly reduced and those remaining become increasingly valuable to the Fishermen. Adaptability, posed in a way to reduce the sensitivity of the fleet, is not acceptable when they are being forced to adapt. Changing methods or targeting different species is only an option if those species are available, both seasonally and legislatively.
8. We consider Thanet Fisherman's Association should have been engaged on all of the points above, ahead of the oFLCP being produced. We also note there has been no engagement on a Statement of Common Ground (SOCG) with fisheries when there are clearly points of disagreement.
9. Since Sealink last engaged with fisheries in 2023, the Tarchon interconnector has been announced in the region and London Gateway port have made fisheries aware of their intention to dredge 20 million cubic meters from the channels, which will include dumping at sea, some of which will be within this region. The MMO consultation on MPA's is considering restricting mobile gear, this will include the Margate Longsands MPA, and we are aware that strategic compensation is looking at additional areas to restrict fishing. These additional

cumulative impacts, relevant to this area and the Sea Link project, will affect local fisheries again. Are these additional projects being added to the cumulative impact assessment in the ES, and considered in the impact on fisheries?

Sea Link outline Fisheries Liaison and Coexistence Plan (oFLCP, Document 9.85, submitted at Deadline 4 in February 2026).

1. With the exception of additional mitigation point CF06 (**Procedures and process for ongoing consultation with fishers regarding cable protection design will be set out in the FLCP**), the addition of the oFLCP in February this year, has not dealt with the points listed above or concerns raised. At point 1.5.5 in the oFLCP, National Grid states its ambition to minimise impacts on fisheries, maximise opportunities for coexistence and collocation and ensure fair treatment of all parties. Consultation with fisheries on the outline FLCP would have given fisheries more confidence in that statement and to that commitment.
2. Notably at point 2.1.3 under Fishing Activity within the Offshore Scheme, bottom drifting is again not defined as a specific fishing method used and is presumably gathered under the umbrella term of drifting.
3. The Sea Link cable is the latest in a series of power cable projects in the region, all of which are at various stages of planning, construction and cable laying. With other developers, the FLCP has been a means by which the Fishing industry can propose mitigation measures, embedded and issue specific, which are relevant to regional fisheries ahead of consent. Mitigation measures, agreed with the developer and added to the FLCP give some comfort to the Fishermen and some protection against the inevitable consequences of cable laying in a congested region. Failures in depths of burial, failures in cable crossing/protection methodology and the modelling of seabed mobility are commonplace and with the most recent cable project the FLCP became the only protection the bottom drifters had against rock being used to cover the cable in sections they fished. Paragraph 8.3.3 of the ES indicates that measures specific to bottom drift fishing need consideration and the FLCP has not done this.
4. We understand the FLCP will be expanded through the planning process but at this stage, what has been set out is very limited and has been without consultation with fisheries. Without any discussion on the mitigation measures needed, or the inclusion of measures that other cable projects have agreed, we are not confident that the FLCP will support coexistence with the fishing industry at this point. In the ES Sea Link has suggested that fishing should not occur over the cable once it is laid. There is no legal reason why fishing may not continue over a buried cable once it is laid, and this point alone does not promote co-existence or give us confidence that the FLCP will reflect what fisheries need. The FLCP should recognise that all methods of fishing, including bottom drifting, will occur over the Sea Link cable once it is laid and protected.

5. We have previously proposed to Sea Link that they should undertake baseline surveys of the bottom drifts that exist on the route, using the vessels that already fish the route, and we consider a commitment to this should be set out in the FLCP. These same baseline surveys were agreed by the most recent interconnector in the region, Neuconnect, and were included in the FLCP. Bottom drift surveys have been undertaken by the Nemo interconnector project and are in the Gridlink interconnector FLCP. Bottom drift surveys have been planned and undertaken collaboratively with Thanet, Whitstable, Harwich and Southwold Fishermen's Associations.
6. Point CF03 states that berms will be installed where cable protection is necessary and designed with a 1:3 profile intended to prevent fishing gears snagging. This is standard oil and gas practice and works for trawlers, not for bottom drifting. Any rock placement means bottom drifting will no longer take place on that ground. Every project in the region, even those that have mitigated, have cost the Fishermen more ground. We do not have the luxury of continuing to lose ground when there are mitigation measures that can minimise those losses.
7. We welcome point CF06 (discussion of alternative cable protection measures) but would want to see this significantly robust to protect bottom drift ground by avoiding rock placement where bottom drifts are proven by the Fishermen and an independent surveyor in bottom drift surveys.
8. Point CF03 states that berms will be installed where cable protection is necessary and designed with a 1:3 profile intended to prevent fishing gears snagging. This is standard oil and gas practice and works for trawlers, not for bottom drifting. Any rock placement means bottom drifting will no longer take place on that ground. Every project in the region, even those that have mitigated, have cost the Fishermen more ground. We do not have the luxury of continuing to lose ground when there are mitigation measures that can minimise those losses.
9. We are happy to provide outline mitigation points to be included in the FLCP to the Secretary of State and the Planning Inspectorate as part of this process.

While this is an outline FLCP, and we will be engaged on the detail going forward, we have been asked by the Planning Inspectorate to comment on our previous concerns and certainly the majority of them are not reduced by this document as it stands. Of the 20 mitigation points currently listed in the oFLCP, fifteen are for all sea users and are not specific to fisheries. There are other mitigation points that we consider should be in the FLCP and ask that future engagement on this creates a plan that works for the Fishermen as well as the developer.

The Secretary of State notes that at Deadline 4, an oFLCP (“outline Fisheries Liaison and Coexistence Plan”) was submitted, and under the terms of the DML condition 4(1)(f) in the dDCO (submitted at deadline 7), the final FLCP must be substantially in accordance with it. If the final FLCP must be substantially in accordance with the oFLCP, then there is a great deal missing at this point.

In light of the fact this project is moving forward with a Deemed Marine License, we are unclear on how many opportunities we will have to safeguard that significant mitigation points are included and are robust, before the license is fully granted. We would ask for consultation on the final FLCP before that point is reached and consent is granted.

We welcome continued engagement with the Planning Inspectorate and Sea Link to safeguard these fishing grounds for the future.

Yours Sincerely,

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Vice Chairman Thanet Fisherman's Association.

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