

Whitstable Fishermen's Association
West Quay
Whitstable Harbour
Kent CT5 1AB

22 October 2026

The Secretary of State for Energy Security and Net Zero
Department for Energy Security and Net Zero
By email: SouthEastAngliaLink@planninginspectorate.gov.uk

Interested Party reference: [REDACTED]

Dear Sir or Madam,

Sea Link Project (EN020026) – Comments on responses to the Secretary of State's request for information dated 28 August 2026

1. The Whitstable Fishermen's Association (WFA) welcomes the opportunity to comment. These comments relate principally to the Applicant's response on commercial fisheries in Document 9.159 [C3-002], Table 1.2, page 25 (Paragraph 9), and to the updated Register of Environmental Actions and Commitments (REAC, Rev H), Outline Offshore Construction Environmental Management Plan (Rev G) and Outline Cable Specification and Installation Plan (Rev E) submitted on 16 October 2026. They should be read alongside the WFA's previous submissions.
2. The WFA supports the comments submitted by Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) dated 22 October 2026, in particular on bottom drift net fishing, cable protection design, boulder relocation and the Pegwell Bay cockle assessment. The points below add to, rather than repeat, those comments.
3. The WFA welcomes new REAC commitment CF09 naming local fishing associations as consultees on the final Fisheries Liaison and Coexistence Plan (FLCP). However, consultation does not secure agreement. The WFA asks that the final FLCP records the concerns raised by the fishing associations, how each has been addressed, and any matters that remain unresolved, so that the MMO has that information when it approves the Plan.
4. CF09 refers to the "Whitstable Fishing Association". The correct name is the Whitstable Fishermen's Association. The WFA asks that this is corrected.
5. KEIFCA's indicative mapping places Thames Estuary cockle Areas 22 and 23 approximately 8.5 km from the nearest offshore project boundary, with Areas 18,

17 and 11 within approximately 10 km. These beds support the WFA's members and the wider Thames Estuary cockle fishery.

6. The Applicant has not set out when, or for how long, seabed-disturbing works (including trenching, jetting and sandwave clearance) will take place in the parts of the route nearest these beds, or how that programme relates to the cockle fishing season and the spat settlement period. Distance alone does not establish that there will be no effect. The Applicant's own Marine Conservation Zone Assessment (section 1.5.10) states that plumes of fine sand, silt and clay from jetting during cable installation could extend up to 11 km, which places all these beds within the potential range of sediment plumes. Cockles are filter feeders, and fine sediment mobilised on a spring tide can travel considerable distances before settling.
7. The WFA therefore asks the Secretary of State to require the Applicant to:
 - set out the indicative timing and duration of seabed works on the sections of route nearest Areas 22, 23, 18, 17 and 11
 - confirm whether its sediment plume modelling, under spring tide conditions, extends to these beds, and if so what suspended sediment and deposition levels are predicted there
 - avoid the most disruptive seabed works on these sections during spat settlement and the peak of the fishing season or, where that is not practicable, explain why; and
 - monitor suspended sediment during these works, with a defined trigger for notifying KEIFCA and the fishing associations.
 - Where the wider construction programme cannot be adjusted around the cockle season, manage the timing of jetting in areas of finer material around the tide, for example jetting on the ebb, to reduce sediment transport towards the cockle grounds
8. KEIFCA has asked that the Pegwell Bay cockle assessment be reviewed against the Thames Estuary Cockle Fishery Order 2024 and current management arrangements. The WFA would add that there is a good prospect of the Pegwell Bay cockle ground being fished more in the future than it is now. The assessment should therefore consider the ground's future value to the fishery, not only current levels of activity, and the Applicant should confirm whether its conclusions still hold on that basis.
9. Updated REAC commitment BE07 prevents sediment being relocated within 50 m of Sabellaria spinulosa reef, blue mussel beds and other Section 41 habitats sensitive to smothering. Commercial cockle beds are not named. The WFA asks

that BE07 is extended to cover cockle beds and other commercially fished shellfish grounds, identified in consultation with KEIFCA.

10. New REAC commitment BE08 provides for consultation with the MMO and statutory nature conservation bodies on the final Monitoring Plan. Where monitoring relates to shellfish stocks or fishing grounds, the WFA asks that KEIFCA and the relevant fishing associations are also consulted.

The WFA recognises the progress made, but does not consider that the Applicant's further submissions yet provide sufficient certainty that impacts on the cockle fishery and on bottom drift net fishing will be avoided, minimised or mitigated, as required by South East Marine Plan Policy SE-FISH-2. The WFA asks the Secretary of State to secure the measures above through the REAC and the Deemed Marine Licence before any decision is made.

Yours faithfully,

[Redacted Signature]

Secretary, Whitstable Fishermen's Association

[Redacted Address]