

Thanet Fishermen's Association
32 Western Road,
Margate
Kent
CT9 3QP

22.10.26

Interested Party Reference Number: [REDACTED]

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).

All interested Parties comment on the responses provided to information request dated 28 August 2026.

Dear South East Anglia Link Case Team,

Thanet Fishermen's Association appreciates the opportunity to further comment on the additional information provided by the applicant. TFA has reviewed the responses and has commented as below. Many of the comments we have made are connected to the representation made by Thanet Fishermen's Association in the previous response.

C3-009 - Responses to Secretary of State's consultation 3 - 7.5.2 (G) Outline Offshore Construction Environmental Management Plan.

1. Page 28. 1.10.45 and page 29 1.10.48 both refer to cable crossings and crossing design. Crossing design is noted as being in line with industry standards and each crossing designed in accordance with International Cable Protection Committee (ICPC) recommendations. The ICPC provides non-binding technical guidelines and recommendations for cable crossing designs and protection. We would point out that crossing design and protection under ICPC guidelines does not include designing for the continuation of fishing methods, specifically bottom drifting and trawling undertaken on the Sea Link route.
2. Page 35. REAC number MPE01 states that during cable route clearance, Out of Service cables will be removed as per industry guidelines. The industry standard guidelines promote the removal of a section of the OOS cable, so a new cable can route through, and that the cut ends be returned to the seabed with a clump weight or chain. In the TFA response to the PEIR, we raised concerns that these cut ends with clump weights and chains often cause severe problems for bottom drifting and trawling. An OOS cable has often been fished over for years but by raising it to the surface to remove a section it inadvertently creates additional hazards. The proximity of OOS cables, and the return of cut ends to the seabed

should be in consultation with fisheries. Previous projects, including the Nemo interconnector and BT Mercator telecom cable, agreed that if cut ends were within bottom drift ground they would be re-buried or sealed to reduce potential snagging.

3. Page 36. REAC number MPE03 states that '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.' There is consistent mention of cable protection, crossing design and industry standards. We are pleased to see mattress protection mentioned here, but there is no commitment to working with the fishing industry in cable crossing and cable protection design in order to minimise impact to fisheries.
4. Page 38. REAC number MPE12 states 'Boulders would be relocated locally in similar habitats and placed to be reflective of the surrounding habitats and not in linear berms which have the potential to disrupt sediment transport.' While this project may not expect to encounter significant numbers of boulders on its route, how and where these are relocated is of significant importance to fishermen and should be done in consultation with fisheries.
5. Page 53. REAC number SN17 states that Cable protection measures will take due consideration of key areas of fishing activity identified in the baseline data, such that those sections of the cable identified as being buried or protected within such areas will minimise risk to gear snagging. As commented in the TFA PEIR response, the applicant's acquisition of fisheries data in Thanet was not undertaken well. Disagreements over the bottom drift method and the position of the applicant regarding fishing over cables, means there is not sufficient baseline fisheries data shown. The data that was entered by Thanet vessels remains incorrectly shown as static rather than bottom drift data. Without engagement on bottom drifting areas, it is not possible to minimise risk to gear snagging.
6. Page 55. We strongly disagree with the Sea Link commitment regarding compliance with MGN661 Navigation - Safe and responsible anchoring and fishing practices. We accept, it is an offence to damage a cable wilfully or through culpable negligence, but it is not an offence to fish over a cable. With this position statement, Sea Link are suggesting fisheries are acting illegally by fishing over a cable, and that is not the case. This undermines the mitigation option discussions that should be discussed to allow fishing to continue over the Sea Link cable. We are constantly being told to collocate and coexist with offshore infrastructure, committing to comply with a guidance note, and suggesting it means no fishing over cables, is not conducive to co-existence. In its core principles, the South East Inshore Marine Plan sets out co-existence support with fisheries. The plan recognises that vessels of less than 12 meters make up nearly half the fleet in the South East and that projects must demonstrate how they will avoid, minimise or mitigate any impacts. The European Subsea Cable Association (ESCA) guidelines for fisheries liaison best

practice note in their general principles that developers should aim to avoid negative impacts from development activities on regional fishing activity, and this is what we are attempting to achieve.

7. We agree with all points raised by Kent and Essex IFCA in their submission dated 22.10.26. For the Thanet Fishermen, the Pegwell Bay Cockle fishery is an important opportunity for a group of Fishermen under considerable pressure from the increasing offshore demands from infrastructure and other projects.

We recognise that these documents state a commitment from the applicant to continue work on the FLCP, including bottom drifting. Our main concern across our comments above, is that while there is commitment to fisheries to undertake and improve the FLCP, the FLCP does not contain any of the mitigation concerns raised by fisheries through this process so far. Comments from other Fishing organisations have raised the same concerns repeatedly and we would ask that these form the basis of the FLCP discussions around all forms of mitigation and that the MMO is fully aware of these concerns when considering the final FLCP.

We would also ask that it is recognised it is not illegal to fish over a cable and this suggestion should not undermine any discussions around mitigation options.

Yours Sincerely,

[Redacted]

Vice Chairman Thanet Fisherman's Association.

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