

22nd October 2026

Kent and Essex Inshore Fisheries and Conservation Authority
Paragon House
Albert Street
Ramsgate
Kent
CT11 9HD

Dear Sir/Madam,

Sea Link Project (EN020026) - Comments on the Applicant's responses to the Secretary of State's requests for information

1. Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) welcomes the opportunity to comment on the Applicant's further submissions, particularly the response to fisheries matters in Document 9.159 [C3-002], Table 1.2, page 25 (Paragraph 9), as well as to the updated Register of Environmental Actions and Commitments (REAC, Rev H), Outline Offshore Construction Environmental Management Plan (CEMP, Rev G) and Outline Cable Specification and Installation Plan (CSIP, Rev E) published on 19 October 2026. This response should be read alongside KEIFCA's submission dated 18 September 2026 concerning paragraph 9 of the Secretary of State's request for information.
2. KEIFCA welcomes the addition of commitment CF09 to the REAC and the CEMP. This expressly identifies KEIFCA and local fishing associations for consultation during development of the final Fisheries Liaison and Coexistence Plan (FLCP) and recognises the need to develop measures specific to bottom drift net fishing. This represents a positive response to part of KEIFCA's previous request.
3. KEIFCA also recognises that Condition 4 of the draft Deemed Marine Licence requires the FLCP to be approved by the Marine Management Organisation (MMO) before the relevant licensed activities commence. However, consultation during development of the Plan does not itself secure agreement on the mitigation measures or expressly provide for consultation with KEIFCA during the MMO's approval process. KEIFCA therefore reiterates its request to be formally named as a consultee for the development, review and approval of the final FLCP, including subsequent amendments affecting fisheries. The final Plan should record the concerns raised, how these have been addressed and any matters remaining unresolved.
4. Despite the progress made, KEIFCA's primary concerns remain. These relate to the loss or displacement of bottom drift net fishing grounds, snagging and damage to fishing gear, and the cumulative and long-term effects on the viability of the fishery. CF09 strengthens the consultation process but leaves the design and effectiveness of fisheries mitigation to future work.

5. Commitment CF03 and paragraph 1.10.42 of the CEMP describe berms with a 1:3 profile and flat crests, intended to prevent snagging. KEIFCA does not consider that this description alone demonstrates compatibility with bottom drift net fishing, where nets may move across the seabed whilst soaking. Whilst indicative protection dimensions are provided in the CSIP, further evidence is required to demonstrate that the proposed materials, dimensions and locations will minimise snagging risks and maintain access to established fishing grounds. KEIFCA also requests confirmation that the fisheries safeguards for cable protection design and consultation will apply equally to additional or replacement protection installed during operation.
6. KEIFCA notes that commitment MPE13 specifies limits on protection length and height adjacent to Goodwin Sands MCZ, subject to stated qualifications, and excludes grout bags within a defined section. Whilst these measures address a different receptor, they demonstrate that more specific design commitments can be provided. KEIFCA considers that similarly clear, fishery-specific design requirements and acceptance criteria should be developed for affected fishing grounds. Alternative protection solutions, including the frond-covered mattresses previously identified by industry, should be considered and, where practicable, the preferred solution agreed with the relevant fisheries sector and reflected in the final CSIP and FLCP.
7. A procedure for gear-loss claims under CF04 remains welcome, but does not prevent snagging or address the separate loss of fishing opportunities where fishermen avoid affected grounds. Consequently, KEIFCA remains unpersuaded that the further submissions provide sufficient certainty to support the reduction of the moderate significant effect on drift netters identified in Document 6.3.4.8 (B), paragraph 8.9.83 to a minor non-significant effect, as proposed in paragraph 8.10.8.
8. KEIFCA also requests clarification of the safeguards for boulder relocation under CSIP paragraph 3.4.3 and REAC commitment MPE12. Although the Applicant does not currently anticipate boulder removal, relocating boulders to similar habitats could introduce obstructions into fishing grounds used for trawling, dredging or bottom drift netting. Habitat similarity and avoidance of linear berms do not, in themselves, address the risks of gear snagging, loss of fishing access or displacement.
9. KEIFCA therefore requests a separate commercial fisheries commitment in the REAC, secured through the relevant approved plans. This should require sensitive fishing grounds to be identified and mapped using available fisheries activity data and local knowledge, in consultation with KEIFCA and the fisheries stakeholders identified in CF09. Boulders should not be relocated into those grounds unless the MMO has approved the proposed locations and mitigation following that consultation and consideration of the risks identified above. Final locations should be surveyed, recorded and communicated to affected fishers, with appropriate charting or marking where required.

10. KEIFCA reiterates its request for the cockle assessment to be reviewed against the current management framework, including the introduction of the Thames Estuary Cockle Fishery (No. 2) Order 2024 and associated changes to the boundaries and management of the regulated and permit fisheries. Pegwell Bay itself remains managed under the Cockle Fishery Flexible Permit Byelaw (CFFPB). The Applicant should update the management information and mapping in paragraphs 8.5.6-8.5.7 and Plate 8.3 of Document 6.3.4.8.A (B), Commercial Fisheries Technical Report (CFTR) and confirm, with supporting reasons, whether the assessment conclusions remain valid under the current arrangements.
11. This review should also consider the potential future contribution of the Pegwell Bay cockle grounds under the current management arrangements, rather than relying solely on current or historic fishing activity. The Applicant's CFTR already recognises the potential for these grounds to become increasingly important. KEIFCA requests confirmation that this potential has been reflected in the assessment.
12. Separately, KEIFCA wishes to highlight potential interactions with cockle fisheries in the outer Thames near the district boundary. Indicative mapping using the publicly available Sea Link DF4 Order Limits dataset places the boundaries of cockle management Areas 22 and 23 approximately 8.5 km from the nearest offshore project boundary, with the boundaries of Areas 18, 17 and 11 within approximately 10 km (Figure 1). These are approximate distances between management-area boundaries and indicative project limits, rather than distances to surveyed cockle stocks. KEIFCA requests that the Applicant verify the spatial relationship between the proposed seabed works and cockle beds within these areas, using the latest project alignment and available stock-distribution data, and explain whether the assessment adequately addresses potential sediment transport to those beds.
13. KEIFCA acknowledges that the Applicant has modelled sediment dispersion for both ploughing and jetting scenarios and assessed effects on shellfish in Document 6.2.4.3(B), paragraphs 3.9.54-3.9.60. Paragraph 3.9.58 reports modelled fine-sand suspended sediment concentrations of 100 mg/l at distances of up to 11 km, associated with resuspension at multiple locations rather than a single continuous plume. This does not establish adverse effects at cockle beds within the identified outer Thames management areas. However, KEIFCA requests that the Applicant identify the relevant modelling outputs and explain the predicted concentrations, exposure durations and deposition at these beds. The response should explain how the sensitivity of cockles, including relevant life stages, supports the conclusion of negligible effects, rather than relying solely on general statements about shellfish mobility or tolerance of suspended sediment. Where the existing assessment does not adequately resolve these matters, supplementary assessment should be provided.

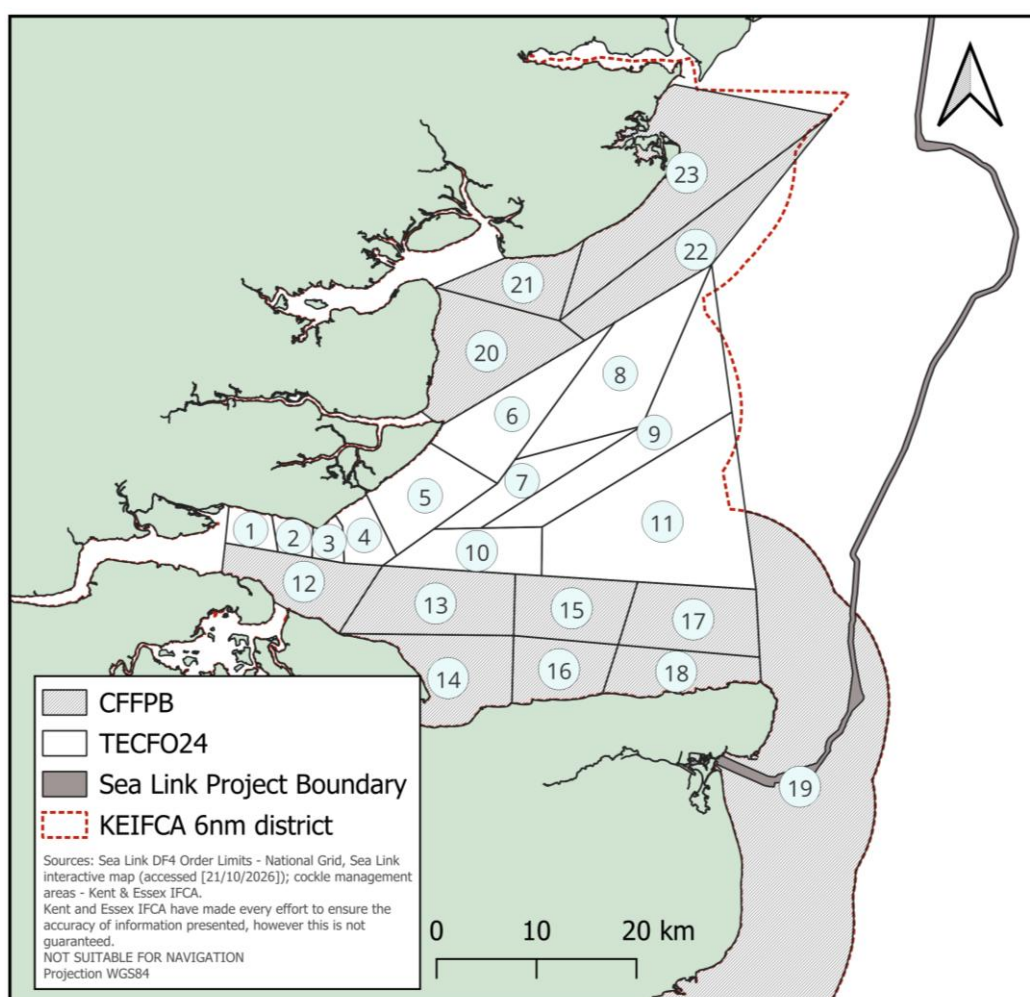


Figure 1: Kent and Essex IFCA District, Thames Estuary Cockle Fishery Order 2024 (TECFO24) and the Cockle Fishery Flexible Permit Byelaw (CFFPB), cockle fishery management areas, and the Sea Link Project Boundary-EN020026.

14. Table 1.2 of the CEMP provides indicative installation periods for the Pegwell Bay to the Sunk in 2028 and the Aldeburgh to the Sunk in 2029-2030. KEIFCA requests clarification of when, and for how long, seabed-disturbing activities would occur in the sections with potential to affect the identified outer Thames beds. This should explain how the proposed programme relates to the cockle fishing season and periods of spawning and spat settlement, and whether repeated disturbance across successive seasons has been adequately considered.
15. The Applicant should explain how these predicted exposures and the proposed programme have informed its assessment of effects on cockle stocks, catch yields and the economic viability of the fishery. The response should distinguish effects on cockle stocks from effects on fishing operations and identify any monitoring or mitigation required. KEIFCA requests a commitment to sediment monitoring, with agreed action thresholds that trigger precautionary mitigation, including restrictions to suitable ebb-tide working windows to reduce sediment transport towards the beds. This builds on the tidal-timing mitigation identified by the Applicant in Document 6.3.4.1.A, paragraph 4.1.4. Relevant cockle beds and any

agreed monitoring and mitigation measures should be clearly identified in the final Offshore CEMP, with appropriate links to the CSIP, FLCP and monitoring plan.

16. KEIFCA also requests confirmation that the assessment considers overlapping or successive sediment disturbance from other relevant projects, including London Gateway works where their location and programme indicate potential interaction with the same cockle beds. Where cumulative effects are possible, the Applicant should identify opportunities to coordinate programmes, monitoring and mitigation with the relevant operators.
17. KEIFCA therefore welcomes the additional consultation commitment but considers that its outstanding fisheries concerns have not yet been fully addressed. Further clarification and sufficiently specific mitigation are required to demonstrate how impacts will be avoided, minimised or mitigated in accordance with South East Marine Plan Policy SE-FISH-2.

If you have any queries regarding this response, please do not hesitate to contact us.

Yours faithfully,

[Redacted signature]

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