



# **East Anglia TWO Offshore Windfarm**

## **Appendix 13.1 Commercial Fisheries Consultation Responses**

### **Environmental Statement Volume 3**

Applicant: East Anglia TWO Limited  
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Table A13.1.1	Consultation Responses

## Glossary of Acronyms

DCO	Development Consent Order
DML	Deemed Marine Licence
DEFRA	Department for Environment, Food and Rural Affairs
IFCA	Inshore Fisheries and Conservation Authority
EIA	Environmental Impact Assessment
ES	Environmental Statement
FLCP	Fisheries Liaison and Co-existence Plan
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
ICES	International Council for the Exploration of the Seas
IMARES	Institute for Marine Resources and Ecosystem Studies
ILVO	Institute for Agricultural and Fisheries Research
MCZ	Marine Conservation Zone
MMO	Marine Management Organisation
MPA	Marine Protected Area
NFFO	National Federation of Fishermen's Organisations
NtM	Notice to Mariners
OFLO	Offshore Fisheries Liaison Officer
PEIR	Preliminary Environmental Information Report
PO	Producer Organisation
SAC	Special Area of Conservation
SPA	Special Protection Area
VisNed	Dutch Fishermen's Federation
VMS	Vessel Monitoring System

## Glossary of Terminology

Applicant	East Anglia TWO Limited.
Beam Trawl	A trawl net whose lateral spread is maintained by a beam across its mouth
Beam trawl -Pulse Wing Trawling	Advanced adaptation of conventional beam trawling where the tickler chains and chain mat of the beam trawl are removed and replaced with trailing electrodes.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction operation, and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Seine netting	A method of fishing that employs a Seine or dragnet. The net hangs vertically in the water with the bottom edge held down by weights and the top edge buoyed by floats.

## 13.1 Consultation Responses

### 13.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the Scoping Report (2017) and the Preliminary Environmental Information Report (PEIR) (2018).
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A13.1.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

**Table A13.1.1 Consultation Responses Related to Chapter 13 Commercial Fisheries**

Consultee	Date/ Document	Comment	Response / where addressed in the ES
<b>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.</b>			
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report notes the loss or restricted access to traditional fishing grounds during construction and operation. This may have subsequent effects on alternative fishing grounds such as those which are fished by smaller vessels. The Inspectorate considers that an assessment on the impacts on commercial fisheries interests should be included within the ES.	Consideration has been given in this chapter to the potential impacts of loss or restricted access to fishing grounds and potential for associated displacement in respect of all fishing fleets active in the study area, including local small vessels ( <b>section 13.6</b> of this chapter).
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report identified the potential need for safety zones around the offshore infrastructure. The Inspectorate considers that the EIA should ensure that a worst case of the extent of such zones should be assessed.	The worst case scenario parameters included in this assessment take account of the implications of the introduction of safety zones during construction/decommissioning and operation ( <b>Table 13.3</b> of this chapter).
The Planning Inspectorate	20/12/2017 Scoping Response	The EIA should acknowledge that the exclusion of certain types of fishing may make an area more productive for other types of fishing.  Accordingly, the assessment of impacts associated with changes in fishing practice during the operational phase of the Proposed Development should include an assessment of potential impacts on fish stocks of commercial interest and the potential reduction or increase in such stocks that will result from the presence of the windfarm development and of any safety or buffer zones.	Potential impacts on fish and shellfish species, including those of commercial importance, are addressed in <b>Chapter 10 Fish and Shellfish Ecology</b> .
The Planning Inspectorate	20/12/2017	The cumulative impacts assessment in the ES should be undertaken in line with Advice Note 17	Consideration has been given to Advice Note 17, for identification of projects included in the cumulative assessment.



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	Scoping Response	particularly in terms of determining those other developments to be included.	
Marine Management Organisation (MMO)	08/12/2017 Scoping Response	The MMO advised that the EA2 area does not support any nationally significant shellfisheries, although there is some potting for crabs, lobsters and whelks as well as some trawling for shrimps in the area.	Noted.
Marine Management Organisation	08/12/2017 Scoping Response	The MMO recognises that the developer has highlighted the likely underrepresentation of smaller vessels within official datasets and the importance of consultation with fishers as a result. Commercial shellfish in the EA2 project area will mostly be targeted by <10m shellfish vessels operating in the inshore area, including the inshore section of the cable corridor. The MMO advises that such vessels are likely to be more sensitive to impacts from construction activities owing to their limited range and ability to relocate to alternative fishing grounds.	Noted. Consultation has been undertaken with a wide range of fisheries stakeholders including skippers of local small vessels (see <b>Table 13.1</b> of this chapter).
Marine Management Organisation	08/12/2017 Scoping Response	The site will be 31km from Lowestoft and 32km from Southwold. The MMO recommends that consideration is given in the ES to the cables being installed and the potential for cables to become exposed, which may impact upon trawling and other fishing activities.	The potential impacts associated with the installation and operational phase of the cables have been taken account of in this chapter ( <b>Table 13.3 and section 13.6</b> of this chapter). As noted in <b>section 13.3.3</b> post-lay and burial inspection surveys will be undertaken after the cables are installed into the sea bed to assess the sea bed status. In addition to burial status, these will identify the presence of construction related sea bed obstacles and, where appropriate and practicable, rectification works would be undertaken.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Marine Management Organisation	08/12/2017 Scoping Response	Good practice has been outlined to ensure the fishing industry is well informed of the survey and construction works. The continuation of the Commercial Fisheries Working Group is commended and the MMO encourages ongoing engagement with the fishing industry. The MMO welcomes the appointment of a Fisheries Liaison Officer to facilitate ongoing communication with the fishing industry.	Noted.
Norfolk County Council	01/11/2017 Scoping Response	The EIA/PEIR should consider the potential impact of the offshore scheme, including any underwater cable routes and other ancillary development on Norfolk's commercial fishing interests. The EIA will need to consider the wider cumulative impacts taking into account existing operational windfarms; those under constructions; those consented and those in planning.	<p>Consideration has been given in this chapter to all relevant offshore infrastructure associated with the proposed East Anglia TWO project for assessment of potential impacts on commercial fisheries, including offshore cables (<b>Table 13.3</b> of this chapter).</p> <p>A wide range of projects and activities have been included in the cumulative impact assessment, including those under construction, consented and/or planned (<b>section 13.7</b> of this chapter).</p> <p>Currently operational offshore windfarms are considered to form part of the existing baseline and therefore have not been included in the cumulative assessment (<b>section 13.7</b> of this chapter).</p>
Norfolk County Council	01/11/2017 Scoping Response	The EIA should set out appropriate mitigation, and where necessary indicate what compensation, will be given to those commercial fishing interests in Norfolk adversely impacted by the operation of the windfarm and/or ancillary development. In addition, the EIA should provide an indication of the likely impact on the local	<p>Consideration has been given throughout the assessments presented in this chapter (including the cumulative assessment) to potential impacts on all fleets known to be active in the study area, including the local inshore fleet (<b>section 13.6 and section 13.7</b> of this chapter).</p> <p>A number of mitigation measures have been incorporated as part of the proposed East Anglia</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		fishing industry particularly when other proposals are taken into account.	<p>TWO project (embedded mitigation) to minimise potential impacts on commercial fisheries receptors, including local vessels. These are described in <b>section 13.3.3</b>.</p> <p>Subject to the findings of the impact assessment, cooperation mechanisms (where required) will be implemented with reference to the following FLOWW Guidelines (FLOWW 2014; 2015).</p>
<b>The following comments were made in response to the PEIR and were taken into account in the production of this ES.</b>			
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	No reference is currently made to commercial fisheries related to Marine Plan policies and how the proposal addressed them	Policies relevant to commercial fisheries described in the East Inshore and East Offshore Marine Plans are listed in <b>Table 13.5</b> of this chapter.
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	The methodology does not provide a transparent assessment of compatibility of fishing activities taking place within the vicinity of the wind farms. We consider that under a fixed foundation scenario a minimum spacing of 1 km+ is needed for beam trawlers and 2km for seine netters is required for some level of fishing activity to co-exist in the vicinity of the array.	<p>As noted in <b>Table 13.3</b> the minimum spacing between turbines proposed for the East Anglia TWO project is 800m in-row and 1,200m inter-row.</p> <p>The assessment presented in this chapter therefore considers that beam trawling activity will be able to resume to some extent during the operational phase within the East Anglia TWO windfarm site.</p> <p>With regard to seine netting, in recognition of the practicalities of operating this gear type within wind farm arrays and considering the worst case minimum spacing, the assessment presented in this chapter assumes that that vessels operating seine nets may not be able to resume activity within the operational East Anglia TWO windfarm site.</p>

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National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	The definitions used under sensitivity lack specificity over what constitutes limited, moderate and extensive operational range and dependence upon the number of fishing grounds. This reduces the confidence we can have in the assessment findings.	The identification of sensitivity is based on parameters such as the operational range, versatility (i.e. ability to deploy various gears/target various species) and availability of grounds. The evaluation of sensitivity levels using the parameters in the ES chapter is informed by data gathered during consultation with fisheries stakeholders (i.e. vessel specifications, gear used, extent of grounds) as well as fisheries data (landings, Vessel Monitoring System (VMS) data, etc.).
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	We note that the voluntary no pulse trawl closures have changed for 2019 from those presented in the technical commercial fisheries report. See: <a href="http://nffo.org.uk/news/pulse-voluntary-closed-areas-extended-for-another-year.html">http://nffo.org.uk/news/pulse-voluntary-closed-areas-extended-for-another-year.html</a>	The voluntary no pulse trawls closures proposed by NFFO/VisNed for 2019 are shown in <b>Figure 13.9</b> . The closed areas proposed in 2018 off East Anglia have now been revised and replaced with a single area running parallel with the coast, with a western boundary on the 12nm limit and the eastern boundary along a parallel line at 18nm from the coast. This new area overlaps with the section of the offshore cable corridor which is located beyond the 12nm limit up to the edge of the north western section of the East Anglia TWO offshore windfarm site.
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	The impact assessment for East Anglia 1 North and East Anglia 2 lists two maps with Dutch beam trawl effort and landing values. Based on the information these maps show it is clear that the data used for this analysis must also comprise data for the brown shrimp fisheries since coastal areas are highlighted that are not trawled by beam- and pulse trawlers targeting fish. Beam trawlers targeting fish don't fish in the Plaice Box.  For the so called Eurocutters, the coastal area is not attractive and regulations prevents larger	The VMS data of Dutch beam trawling used to inform this chapter is as provided by IMARES. The dataset does not differentiate between flatfish and shrimp beam trawling activity. The extent of the Plaice Box has been included in <b>Figure 13.7</b> and <b>Figure 13.8</b> and reference has been made in the chapter to the fact that in this area Dutch beam trawlers do not target fish.

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		<p>vessels from fishing in this area, as can be seen in the attached maps provided by VisNed there is no pulse fishing within the Plaice Box and we can assure that regular beam trawling also does not take place there. The inshore area of the Plaice Box is of great importance to the brown shrimpers and that is what is reflected in the maps supporting the impact assessment. The brown shrimp fleet of 200+ vessels almost exclusively concentrates within the 12 nautical mile limit from Belgium up to Denmark. The only area where they occasionally fish outside of the 12 NM limit is in the Sylt area in the German Bight. Figure 1 shows a more realistic map based on VMS data of pulse trips by beam trawlers in 2016. The lack of activity north of the Wadden Islands and in the Plaice Box can be noted.</p> <p>This strong concentration of vessels not affected by the development of the East Anglia 1 North and East Anglia 2 projects on such a small area, while being considered in the impact assessment, gives a distorted impression of the importance of the project areas to the fleet segment that do get affected. Therefore the statement in the Commercial Fisheries Chapters that “within the offshore development area, activity occurs at comparatively lower levels” is based on flawed data and should be reconsidered after an adequate analysis has been conducted.</p> <p>For a sound impact assessment of East Anglia 1 North and East Anglia 2 for the affected beam trawl fleet segment, the impact assessment should therefore exclude the brown shrimpers</p>	

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		and only focus on beam- and pulse trawlers targeting fish.	
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	<p>Safety Assessment: Gear Snagging</p> <p>The safety assessment for snagging gears should follow the same approach as the navigation impact assessment, which uses traffic survey data to provide a probabilistic assessment of risk that relates frequency with severity of occurrence in order to define whether the risk remains within acceptable limits or further mitigation is required. No evidence of the details of such an assessment is currently presented.</p>	<p>For assessment of safety issues, the standard sensitivity/magnitude matrix approach is not considered appropriate. Instead, in this instance, the assessment identifies potential risks.</p> <p>As outlined in <b>section 13.6.1.6</b> and <b>section 13.6.2.6</b> of this chapter, a number of measures have been proposed to minimise potential for snagging to occur, so that risks remain within acceptable limits.</p> <p>These measures are aimed at ensuring that skippers which intend to fish within the operational site are provided with adequate information to allow them to make an informed judgement of the risks associated with fishing in areas relevant to the East Anglia TWO project.</p>
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	Existing plans and projects are not factored into the assessment and are assumed to form part of the baseline. We consider this will disguise impacts already being carried by impacted parts of the fleet as the assessment assumes fishing businesses have perfectly adapted to previous impacts without cost. This results in a "shifting baseline syndrome", similar to that which is attributed to environmental change as reference points change from one project application to the next; there is no "review mirror" in the assessment.	<p>Existing projects are considered part of the existing environment in line with the methodology described in <b>Chapter 5 EIA Methodology</b> which reflects The Planning Inspectorate (2015) Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects.</p> <p>Including them in the assessment would represent double counting of their effect. With this in mind, existing plans and projects have not been considered for assessment of potential impacts on commercial fisheries.</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	<p>The CIA lacks transparent data analysis to support its conclusions. There is also no evidence that proposed fisheries measures associated with the marine protected areas have been included in the CIA.</p> <p>The PIER notes that the boundaries of MPAs have not been defined in all cases. That is not true for any designated site as designation fixes site boundaries. There are only possible proposals such as tranche 3 MCZs that have yet to be designated where that maybe the case.</p> <p>The qualitative nature of the sensitivity and magnitude criteria means that the CIA needs to clearly evidence its analysis in order to draw conclusions on the significance of impacts to fleets so that we are able to consider the validity of the conclusions in more detail. In order to address this, we suggest the publication of map outputs that include projects and plans in the CIA overlaid with fishing activity data. We note that this is the only practical way to carry out the assessment and therefore it should not be an onerous request. Figure 2 provides an overview of potential measures that may be incorporated into such an output.</p> <p>Management measures for many sites in the southern North Sea are now sufficiently progressed to be included in the CIA in our view. In response to the Norfolk Vanguard planning application we have provided Brown and May with details on the proposed MPA fisheries management measures in the Southern North Sea, covering the UK, Netherlands and Germany including spatial boundaries, gear types effected and their current status of introduction (these do</p>	<p>Various figures have been produced in support of the cumulative assessment (<b>Figure 13.40 to 13.53</b>). These include information on the distribution of fishing activity for key methods as well as information on the location of proposals for closed areas provided by NFFO/VisNed as part of the Norfolk Vanguard project examination process, and proposals for measures in the North East Farnes Deep MCZ and Swallow Sands MCZ.</p> <p>Consideration has been given to proposals for closed areas in UK, Dutch and German waters.</p> <p>It should be noted that in the case of proposals for closed areas in UK waters, with the exception of the closed areas in the Dogger Bank SAC, the current proposals have yet to be agreed by other member states.</p> <p>For the purposes of the cumulative assessment, a conservative approach has been taken and it has been assumed that the current proposals for closed areas will be approved and eventually implemented.</p>



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		<p>not include measures for North East Farnes Deep MCZ or Swallow Sands MCZ although these are also available).</p> <p>We have confirmed that the measures are highly unlikely to materially change and are subject now only to high level procedural confirmation. The German measures were submitted by the German government to the Commission on 1st February 2019. The Commission has 3 months to adopt the measures following a completed submission. Following that all that is left is for Germany to implement the measures under delegated act. The expectation therefore is that the measures will be in place in a matter of months rather than years. The Netherlands measures are at a similar stage and are expected to come into force in December 2019. The timing of the introduction of the measures in the UK is less certain due to Brexit but can reasonably be expected to be introduced in the next few years. We therefore consider that these proposals are comprehensive, are at an advanced stage, are highly relevant to the Cumulative Impact Assessment, and can be readily incorporated into the assessment.</p>	
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	We welcome the intention to develop a coexistence and fisheries liaison plan which should be developed in agreement with fisheries interests. While we recognise it should be a living document that may be added to, or amended through the course of the project, it should in our view be substantially developed at project application stage and not left as a post consent matter.	Noted. The fisheries liaison and coexistence plan (FLCP) is secured in the draft DCO



Consultee	Date/ Document	Comment	Response / where addressed in the ES
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	<p>The commercial fisheries assessment outlines proposed in built mitigation measures including:</p> <ul style="list-style-type: none"> <li>• Maintaining a commercial fisheries working group</li> <li>• Appointment of FLO</li> <li>• Reporting of dropped objects</li> <li>• Protocols for snagging or loss/damage of fishing gear</li> </ul> <p>In addition to these measures outlined in the commercial fisheries assessment, it should also include other operational management arrangements such as provisions for gear clearance and disruption settlements, navigation corridors and protocols, and retrieval of displaced static gears from safety zones.</p>	<p>Noted.</p> <p>The operational arrangements highlighted by NFFO/VisNed will be given due consideration in the Fisheries Liaison and Co-Existence Plan (FLCP) which is secured in the draft DCO and that will be produced post-consent.</p>
National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	<p>The following measures associated with minimising and mitigating cable snagging risks and access to fishing grounds should also form part of mitigation provisions:</p> <ul style="list-style-type: none"> <li>• The cable burial plan should be consulted on with the fishing industry.</li> <li>• Where burial is not achieved on installation, reburial approaches or back filling where appropriate should be considered before electing to apply cable protection measures. Where cable protection is necessary the approach should be considered so that it minimises the potential for snagging risks. The approach should be consulted on with the fishing industry.</li> </ul>	<p>A number of measures have been proposed by the Applicant which are of relevance with regards to minimising potential for snagging risks. These are included as requirements in the draft DCO which must be approved by the MMO prior to construction.</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<ul style="list-style-type: none"> <li>• The results of post burial inspection surveys should be communicated to the regulator/fishing industry.</li> <li>• The cable burial risk assessment should comprise an assessment of cable exposure risk as well as risk to other marine users. It should be reappraised at appropriate intervals during the operational phase of the project.</li> <li>• The cable burial risk assessment should be linked to an appropriate cables survey/monitoring regime.</li> <li>• Burial status results from monitoring should be communicated to the fishing industry.</li> <li>• Any identified exposed cables should be reported via NTMs and to the Kingfisher information system.</li> <li>• Exposed cables should be protected by guard vessel until appropriate remedial measures can be completed.</li> <li>• Remedial approaches should consider reburial in the first instance as a way of avoiding the needed for cable protection. Where cable protection is necessary the approach should be considered so that it minimises the potential for snagging risks. The approach should be consulted on with the fishing industry.</li> <li>• Post remediation surveys should be undertaken and communicated to the fishing industry to provide best assurance post works that no residual snagging risks remain.</li> </ul>	

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National Federation of Fishermen's Organisations/ VisNed	PEIR Response 26 <sup>th</sup> March 2019	<p>We encourage the use of fisheries community project funding as part of a mitigation strategy and we encourage the marine renewables industry to collaborate to establish the following:</p> <ul style="list-style-type: none"> <li>• A scheme for compensating for unattributable gear loss claims as a result of snagging on offshore renewable energy infrastructure or dropped objects.</li> <li>• Improving safety provision through considering the support of active "in wheel house" safety warning systems for seabed hazards.</li> </ul>	Noted.
Belgian Producers Organisation (Rederscentrale)	PEIR Response 26 <sup>th</sup> March 2019	<p>As a stakeholder and the only Belgian recognized PO, the Rederscentrale would like to participate in this consultation and provide feedback. Firstly, the VMS data from the Belgian fleet that is currently being used in the Preliminary Environmental Information Report (PEIR) is rather outdated (2014). Therefore, we ask to also take into account more up-to-date data to consider the overall impact on the Belgian fleet. The Belgian scientific institute ILVO can provide these data.</p>	<p>Up to date data on Belgian fishing activity was requested from ILVO in 2018 and again in 2019. ILVO is reviewing the data request but has been unable to provide the data prior to the finalisation of the chapter. As such, the most recent available data (2010- 2014) has been used to inform the assessment.</p>
Belgian Producers Organisation (Rederscentrale)	PEIR Response 26 <sup>th</sup> March 2019	<p>The PEIR shows that there is Belgian activity within the 6 to 12-miles zone, in the area where the cable corridor will be placed. The Belgian fleet has historical fishing rights that give the small scale fleet segment the right to fish there. For some small scale fishing vessels these areas are regular fishing grounds. Outside the 12-miles zone, there is also activity of Belgian beam trawl vessels from the large scale fleet segment more towards the west of these areas.</p>	Noted.

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Belgian Producers Organisation (Rederscentrale)	PEIR Response 26th March 2019	Moreover, there are many Marine Protected Areas (MPAs) in the area. The designation of the Outer Thames Estuary as a Special Protection Area (SPA), which comprises three areas with possible fishing restrictive measures, in combination with the development of the nearby windfarms will have socio-economic consequences for the Belgian fleet. It is correctly stated in the PEIR that the Belgian fleet has a broad fishing-area, we however fear that in the future fishermen will be deprived from important fishing grounds due to the development of windfarms and the designation of MPAs.	Consideration has been given in this chapter to the potential for cumulative impacts to arise taking account of other projects and activities, including current proposals for closure areas to fishing within MPAs (see <b>section 13.7</b> of this chapter). From the information available to date, it is understood that at the time of writing there are not defined proposals for future closed areas to fishing in the Outer Thames Estuary SPA (JNCC 2019 <sup>1</sup> ). As such, specific reference to this site has not been made in the cumulative assessment.
Belgian Producers Organisation (Rederscentrale)	PEIR Response 26th March 2019	<p>Lastly the PEIR states that it will be guaranteed that the cables will be buried sufficiently and that it will be possible to fish between the turbines. It is therefore concluded that fishing vessels can continue fishing safely. Our members indicate however that fishing near cables and fishing between turbines always entails a risk.</p> <p>We find it important that in the future the same level of income is guaranteed to the Belgian fishermen. We therefore ask to take socio-economic consequences into account. These areas in the North Sea are, for some Belgian vessels in particular, important.</p> <p>Taking into account all of the above, the Rederscentrale kindly requests to remain involved as a stakeholder in the ongoing process. We remain available for further consultation.</p>	<p>Existing UK legislation does not prevent fishing from occurring in operational windfarms. Considering this and the minimum spacing between turbines proposed for the East Anglia TWO project (800m in-row and 1,200m inter-row), it is expected that for the most part fishing would be able to resume within the East Anglia TWO windfarm site during the operational phase.</p> <p>Information on the level of activity of the Belgian fleet, in terms of both fishing effort and value, has been included in Chapter 13, based on the latest fisheries statistics and VMS data that has been made available by ILVO.</p> <p>As outlined in <b>section 13.6.1.6 and section 13.6.2.6</b> of this chapter, a number of measures have been proposed to minimise snagging potential, so that safety issues for fishing vessels remain within acceptable limits.</p>

<sup>1</sup> JNCC (2019). Outer Thames Estuary SPA. Activities and Management. Available online form: <http://jncc.defra.gov.uk/page-7249> (accessed 28.06.2019)

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
			Consultation with Rederscentrale will be on-going and will continue post-consent.
Eastern Inshore Fisheries and Conservation Authority	PEIR Response 12 <sup>th</sup> March 2019	<p>Policies GOV2, GOV3 and FISH1</p> <p>Within the Eastern IFCA district, the inshore section of the proposed East Anglia TWO export cable corridor is positioned in ICES statistical rectangle 33F1, an important area for potting fisheries targeting crab, lobster and whelk. These fisheries provide a substantial contribution to the local economy, represented by first sale value, shellfish factory sales and tourism revenue. Gillnetting, longlining and trawling also occur to a lesser extent within this area. Most vessels engaged in these fisheries are of the smaller vessel size category (under 10m in length) and primarily targeting fish species such as sole, plaice, rays, cod and bass. Potential impacts on commercial fisheries include temporary loss of access to fishing ground, increased transit times and changes in the distribution of target species. Although the level of fishing effort that occurs inshore is much less than larger offshore fishing vessels, displacement during construction or maintenance works has the potential to have disproportionately large impacts on the inshore fishing fleet.</p>	<p>Noted.</p> <p>The potential impact of loss or restricted access to traditional fishing grounds and associated displacement has been considered for assessment within this chapter for all relevant commercial fisheries receptors, including the local fleet (<b>section 13.6.1.2.3, section 13.6.1.3 section 13.6.2.2.3, and section 13.6.2.3</b> of this chapter).</p>
Eastern Inshore Fisheries and Conservation Authority	PEIR Response 12 <sup>th</sup> March 2019	<p>Policy GOV2 and GOV3</p> <p>Eastern IFCA acknowledges the mitigation measures relevant to commercial fisheries, the creation of the Commercial Fisheries Working group, as well as appointment of a Fisheries Liaison Officer to advise the fishing industry on operations.</p>	<p>Noted.</p> <p>Consultation with relevant fisheries stakeholders is on-going and will continue post-consent.</p>

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		We also support the use of advertisement on Kingfisher charts and the promulgation of Notice to Mariners, to manage and minimise the disruption of fishing activities; this communication is extremely important and should be carried out on a continuous basis and well in advance of any scheduled works. We would ask that these measures are coupled with regular communication with the relevant fisheries managers – Eastern IFCA out to six nautical miles and the Marine Management Organisation, as well as Defra beyond the Eastern IFCA boundary. Regular communication ensures that mitigation includes the most up-to-date fisheries management measures and advice.	
The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	For some months we have engaged in discussions through the working group and we appreciate the efforts by the developers to have open and meaningful discussion with our members however, there are still to date matters that are of serious concern which will create some major issues for all the inshore fleet on the east coast if the project goes ahead.	The Applicant is committed to working closely with commercial fisheries stakeholders to address their concerns and minimise potential impacts.  Consultation with fisheries stakeholders in relation to the East Anglia TWO project is on-going and will continue post-consent.
The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	Our members only have previous experience on how past and ongoing wind farm projects have been managed and how they have compromised the commercial activities of fishermen within the Harwich and east coast area. Sometimes a disruption payment has cushioned the impact during construction but we wish to stress that this objection has nothing to do with money; we just do not want any more wind farms, for the reason below, and we have our share.	Noted.

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The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	<p>We are convinced, that certain further areas will become un-fishable and they will remain so whilst the proposed wind farm is in operation and possibly longer.</p> <p>Our members fishing (all under 10m vessels) will be compromised in the proposed areas. In the past the developer has agreed to pre and post construction surveys but because of the uncertain stability of the sea bed on the east coast (continually shifting seabed) what may be satisfactory one day does not give the guarantee it will be safe to fish in the future.</p> <p>We have in all discussion stated that cables will not stay buried in certain sections, which is exactly what has occurred on the Gabbard and Gunfleet wind farms. Any exposed cable is a serious snagging hazard and could have serious consequences for the vessels safety and no skipper is willing to endanger his vessel and crew. The applicant will I am sure say they will follow best practice techniques but will not be able to give cast iron guarantees that cables will be buried and stay buried. The licence conditions will state the seabed should be restored however, again from our experience it will not happen in certain areas. Every cable crossing will have to be covered and each covering will create additional hazards!</p>	<p>The Applicant notes the concerns raised by the Harwich Fishermen's Association.</p> <p>As noted in <b>section 13.6.2.6</b> of this chapter, in order to assess the sea bed status, post-lay and burial inspection surveys will be undertaken after installation of cables. In addition, a cable burial plan will be required as per the draft DCO as discussed in <b>section 13.3.3</b> of this chapter.</p> <p>Furthermore, the location of cable protection and crossings would be made available to fishing stakeholders and in line with standard oil and gas industry practice, in instances where cable protection is required, procedures would be carried out to ensure that the protection methods used are compatible with fishing activities where feasible and practical.</p> <p>As described in <b>section 13.3.3</b> of this chapter, the required levels of information distribution would be undertaken through the channels of the Kingfisher Information System, Notices to Mariners, along with direct liaison with fishermen and their representatives. This will include mechanisms for appropriate communication with the fishing industry in the event that cables become unburied during the operational phase (i.e. through the FLO and appropriate channels such as the Kingfisher Information Service).</p>
The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	<p>Over the recent years our fishing activities has been restricted over extremely large areas due to the provision of previous and ongoing sustainable renewable energy schemes and any additional projects on the east coast must be given serious consideration. These sites were regular fishing grounds used by our members but are now no</p>	<p>Due consideration has been given in this chapter to the potential for other projects/activities to result in cumulative impacts on commercial fishing activities. This has taken account of all fishing fleets active in areas relevant to the East</p>



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		<p>longer available. The knock on effect is that all the fishing activities have been condensed into much smaller areas, with our members struggling to have viable areas to work. Any new additional wind farm will compound this issue, hence our objection.</p> <p>There are ongoing proposals on the east coast that will, if approved, compound the issues further, such as the Marine Conservation Zones, Harwich Haven Authority new Maintenance Dredge Disposal Site and numerous major cable installations out of the Thames. Two existing wind farms have already applied to The Crown Estate for expansion with planning application forthcoming.</p>	<p>Anglia TWO project, including the local inshore fleet (<b>section 13.7</b> of this chapter).</p>
The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	<p>An additional effect to our members is that, because of the local inshore areas being restricted, longer journey times will be forced on our members, increasing the carbon footprint and running costs of all our vessels. This will also place additional challenges to our members.</p>	<p>The potential for the construction /decommissioning and operational phase of the East Anglia TWO project to result in increased steaming times to fishing grounds has been taken account of in this chapter (see <b>section 13.6.1.4</b> and <b>section 13.6.2.4</b> of this chapter.</p>
The Harwich Fisherman's Association	PEIR Response 19 <sup>th</sup> March 2019	<p>If the East Anglian Two proposal is granted approval, the local fishing fleet (our members) will suffer considerable changes to their existing fishing area but it will also have long term affect on the future generation who hopefully would have inherited a credible and sustainable fishing industry on the east coast, which now must be in question.</p> <p>The proposed wind farm is totally opposed by our association</p>	<p>The Applicant is committed to working closely with commercial fisheries stakeholders. The appropriate liaison will be undertaken with all relevant fishing interests to ensure they are fully informed of all construction, maintenance and decommissioning activities. In order to ensure and maintain regular communication, a Commercial Fisheries Working Group (CFWG) has been established to cover liaison in respect to East Anglia ONE, East Anglia THREE, East Anglia TWO and East Anglia ONE North.</p>



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			The CFWG aims to identify and develop co-existence strategies during a project's lifecycle. A FLCP will be produced for the proposed East Anglia TWO project, post-consent. It is expected that the CFWG will also be used to discuss any mitigation necessary for the proposed East Anglia TWO project where appropriate.
Wightman Fishing Association	PEIR Response 29 <sup>th</sup> March 2019	We are very worried about the effects the construction of these arrays will have on our fishery. We have been fishing these areas successfully for many years whilst we attend the commercial fisheries working groups we feel that this is only a forum for debate once the decision to build has been taken. We oppose any more construction of windfarms along our East Anglian coast do to the loss of area of productive fishing grounds we fish with small boats of limited range so we have to work together to mitigate the effects of these construction projects.	<p>The Applicant is committed to working closely with commercial fisheries stakeholders. The appropriate liaison will be undertaken with all relevant fishing interests to ensure they are fully informed of all construction, maintenance and decommissioning activities. In order to ensure and maintain regular communication, a CFWG has been established to cover liaison in respect to East Anglia ONE, East Anglia THREE, East Anglia TWO and East Anglia ONE North.</p> <p>The CFWG aims to identify and develop co-existence strategies during a project's lifecycle. A FLCP will be produced for the proposed East Anglia TWO project, post-consent. It is expected that the CFWG will also be used to discuss any mitigation necessary for the proposed East Anglia TWO project where appropriate.</p>
Southwold Fisherman's Association	PEIR Response 25 <sup>th</sup> March 2019	<p>For some months we have engaged in discussions through the working group and we appreciate the efforts by the developers to have open and meaningful discussion with our members. However, there are still to date matters that are of serious concern which will create some major issues for all the inshore fleet on the east coast if the project goes ahead as listed.</p> <p>Previous experience on how past and ongoing wind farm projects have been managed and how</p>	<p>Noted.</p> <p>Consultation with fisheries stakeholders is ongoing and will continue post-consent.</p> <p>The Applicant is committed to working closely with commercial fisheries stakeholders. The appropriate liaison will be undertaken with all relevant fishing interests to ensure they are fully informed of all construction, maintenance and decommissioning activities. In order to ensure</p>

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		they have compromised the commercial activities of fishermen within the Southwold and east coast area. We are convinced certain further areas will become un-fishable and they will remain so whilst the proposed wind farm is in operation and possibly longer.	<p>and maintain regular communication, a CFWG has been established to cover liaison in respect to East Anglia ONE, East Anglia THREE, East Anglia TWO and East Anglia ONE North.</p> <p>The CFWG aims to identify and develop co-existence strategies during a project's lifecycle. A FLCP will be produced for the proposed East Anglia TWO project, post-consent. It is expected that the CFWG will also be used to discuss any mitigation necessary for the proposed East Anglia TWO project where appropriate.</p>
Southwold Fisherman's Association	PEIR Response 25 <sup>th</sup> March 2019	Our members fishing (all under 10 meter vessels) will be compromised in the proposed areas. In the past the developer has agreed to pre and post construction surveys but because of the uncertain stability of the sea bed on the east coast (continually shifting seabed) what may be satisfactory one day does not give the guarantee it will be safe to fish in the future. We have in all discussion stated that cables will not stay buried in certain sections, which is exactly what has occurred on the Gabbard and Gunfleet wind farms. Any exposed cable is a serious snagging hazard and could have serious consequences for the vessels safety and no skipper is willing to endanger his vessel and crew. The licence conditions will state the seabed should be restored however, again from our experience it will not happen in certain areas. Every cable crossing will have to be covered and each covering will create additional hazards.	<p>The Applicant notes the concerns raised by the Southwold Fisherman's Association.</p> <p>As noted in <b>section 13.6.2.6</b>, in order to assess the sea bed status, post-lay and burial inspection surveys will be undertaken after installation of cables. In addition, a cable burial plan will be required as part of the DML, as discussed in <b>section 13.3.3</b> of this chapter.</p> <p>Furthermore, the location of cable protection and crossings would be made available to fishing stakeholders and in line with standard oil and gas industry practice, in instances where cable protection is required, procedures would be carried out to ensure that the protection methods used are compatible with fishing activities where feasible and practical.</p> <p>As described in <b>section 13.3.3</b> of this chapter, the required levels of information distribution would be undertaken through the channels of the Kingfisher Information System, Notices to Mariners, along with direct liaison with fishermen and their representatives. This will include</p>

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			mechanisms for appropriate communication with the fishing industry in the event that cables become unburied during the operational phase (i.e. through the FLO and appropriate channels such as the Kingfisher Information Service).
Southwold Fisherman's Association	PEIR Response 25 <sup>th</sup> March 2019	Over the last ten years our fishing activities has been restricted over extremely large areas due to the provision of previous and ongoing sustainable renewable energy schemes. These sites were regular fishing grounds used by our members but are now no longer available. The effect has been a displacement of certain vessels into other areas and additional strain on fishing resources available. Any new additional wind farm will compound this issue. There are ongoing proposals on the east coast that will, if approved, compound the issues further, such as the Marine Conservation Zones, Harwich Haven Authority new Maintenance Dredge Disposal Site and numerous major cable installations out of the Thames. Two existing wind farms have already applied to the crown estate for expansion with planning application forthcoming.	Due consideration has been given in this chapter to the potential for other projects/activities to result in cumulative impacts on commercial fishing activities. This has taken account of all fishing fleets active in areas relevant to the East Anglia TWO project, including the local inshore fleet ( <b>section 13.7</b> of this chapter).
Southwold Fisherman's Association	PEIR Response 25 <sup>th</sup> March 2019	Further restriction of fishing areas cause additional steaming times and costs in fuel as other areas are fished. It also can cause additional safety issues with small vessels further out at sea away from home ports.	The potential for the construction /decommissioning and operational phase of the East Anglia TWO project to result in increased steaming times to fishing grounds has been taken account of in this chapter (see <b>section 13.6.1.4</b> and <b>section 13.6.2.4</b> of this chapter.  Safety issues are addressed in <b>section 13.6.2.6 and section 13.6.1.6</b> of this chapter.
N.W. Cattermole	PEIR Response	As a full time fisherman of course I dread the thought of yet another disturbance to my prime	The Applicant is committed to working closely with commercial fisheries stakeholders. The

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(Fisherman)	20 <sup>th</sup> March 2019	fishing grounds, not only when the works are underway, but also in the longer term the disturbance to the fishing grounds/seabed.	<p>appropriate liaison will be undertaken with all relevant fishing interests to ensure they are fully informed of all construction, maintenance and decommissioning activities. In order to ensure and maintain regular communication, a CFWG has been established to cover liaison in respect to East Anglia ONE, East Anglia THREE, East Anglia TWO and East Anglia ONE North.</p> <p>The CFWG aims to identify and develop co-existence strategies during a project's lifecycle. A FLCP will be produced for the proposed East Anglia TWO project, post-consent. It is expected that the CFWG will also be used to discuss any mitigation necessary for the proposed East Anglia TWO project where appropriate.</p>
Hanson Aggregate Marine Ltd (HAML)	PEIR Response 19 <sup>th</sup> March 2019	<p>Concerned that there is potential for existing activities, e.g. navigation and fishing, being displaced to areas where marine aggregate operations have traditionally taken place, increasing the operational risks to ourselves and other aggregate operators/licenses (including H&amp;S issues arising from navigational risk).</p> <p>Associated with displacement are the increased issues that will arise from the "squeeze" and condensing of activities. The nature of these impacts are likely to be disproportionately harder to overcome for dredging operators concerned because of the differences in comparative size/value of the projects.</p>	<p>The potential impact of displacement of fishing activity into other areas has been assessed in Chapter 13 for the project alone (<b>section 13.6</b>) and cumulatively with other projects/activities, including aggregate dredging (<b>section 13.7</b>).</p> <p>In addition, marine aggregate dredgers have been considered within the baseline and assessment of impact on commercial vessels presented in <b>Chapter 14 Shipping and Navigation (section 14.6.1)</b>.</p>