

From: [Elise Quinn](#)
To: [Sian Evans](#)
Cc: [Gemma Keenan](#); [Judith Stoutt](#)
Subject: Eastern IFCA Deadline 8 Submission
Date: 29 May 2019 15:42:13
Attachments: [2019_05_29_Deadline_8_Submission_comments_on_SIP.pdf](#)

Hi Sian,

Please find attached a submission for Deadline 8 that contains comments on the outline Site Integrity Plan for Haisborough Hammond and Winterton SAC (submitted by the Applicant for Deadline 7).

Kind regards,

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**Application by Norfolk Vanguard Limited for an Order
Granting Development Consent for the Norfolk Vanguard
Offshore Wind Farm Project**



**Deadline 8 Submission by the Eastern Inshore Fisheries
and Conservation Authority**

**Comments on the Outline Norfolk Vanguard Haisborough Hammond and
Winterton Special Area of Conservation Site Integrity Plan submitted at
Deadline 7**

29th May 2019

Eastern IFCA have reviewed the 'Outline Norfolk Vanguard Haisborough Hammond and Winterton Special Area of Conservation Site Integrity Plan' (Version 1 as submitted at Deadline 7). We would like to request a minor amendment to the Outline Site Integrity Plan (SIP).

At present the SIP states the following (Section 4.1, Paragraph 46 and 47):

"Two fisheries bye-law areas have been proposed within the HHW SAC which, if implemented would overlap with sections of the Norfolk Vanguard offshore cable corridor. The bye-law areas have not yet been designated and, if designated, relate specifically to restrictions on bottom towed fishing gear and therefore do not apply to Norfolk Vanguard."

The draft byelaw areas have been identified with the aim of protecting the two priority Areas to be Managed as Reef shown in Figure 4.1. These areas are not extensively reef but have been identified as areas which have potential to become reef if the recurring impact from bottom towed fishing gear is ceased in these areas. Should the byelaw areas be implemented, they would continue to be subject to review and could be increased or decreased, where evidence supports such a change. Section 5.2 outlines the process that will be undertaken by Norfolk Vanguard Limited to minimise impacts on these priority management areas."

Eastern IFCA would like to note that the claim that the areas "are not extensively reef but have been identified as areas which have potential to become reef if the recurring impact from bottom towed fishing gear is ceased in these areas" is not an accurate representation of Eastern IFCA's proposed Restricted Area 36, which coincides with the cable corridor. As outlined in our Additional Submission (17th May 2019), in order to develop the restrictions, Eastern IFCA reviewed Natural England's modelled data, acoustic data and ground truthing data as well as Eastern IFCA habitat mapping data. These results were used in conjunction with an assessment of raw video data supplied by the Centre for Environment, Fisheries and Aquaculture Science (Cefas) to confirm the presence of *Sabellaria* reef. Restricted Areas 36, 37 and 38 are all areas where both Eastern IFCA and Natural England have high confidence that the feature is present and requires protection to ensure the delivery of the site's conservation objectives. Please note these comments are only relevant to Eastern IFCA's proposed

byelaw areas and we have not made consideration of proposed restrictions outside of the six nautical mile limit.

If possible, Eastern IFCA would request that Paragraph 47 of the Outline Norfolk Vanguard Haisborough Hammond and Winterton Special Area of Conservation SIP is edited to reflect these comments.