

07 November 2018
Our Ref: 2018_10_10-458
Your Ref: 20010675

Dear Ørsted,

Responses to the Examining Authority's Written Questions - Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA)

The role of the Eastern IFCA is “to lead, champion and manage a sustainable marine environment and inshore fisheries” in our district, which extends from the Humber to Harwich, and six nautical miles out to sea. The nearshore section of the Hornsea Project Three Cable Corridor lies within the Eastern IFCA district.

Following on from the preliminary meeting on the 2nd October 2018, please find our responses to the questions issued on the 9th October 2018, and directed to Eastern IFCA, below:

Q1.2.13 - Representations from NE [RR-097], the MMO [RR-085] and the EIFCA [RR-070] suggest that there is a need for additional survey data to be collected for the nearshore cable corridor re-route.

Please explain why historical data are insufficient and state what, in your view, would be required to provide an adequate baseline.

The Applicant used a combination of Hornsea Three site specific data and desktop data sources to characterise seabed types within the nearshore section of the cable corridor. Hornsea Three site specific data however, did not extend into the re-routed area of cable route that runs through The Wash and North Norfolk Coast Special Area of Conservation (SAC) (Figure 1). Biotopes (habitat type supporting particular species) in this area were instead determined by using desktop data sets to extend the nearshore biotope maps generated from the Hornsea Three site specific benthic ecology data into the re-routed area and provide the baseline characterisation for the Environmental Impact Assessment (Paragraph 2.7.6.2. of Volume 2, Chapter 2: Benthic Ecology). Whilst desktop data indicated sediment types were broadly similar across the area with sandy sediments inshore grading into coarse/mixed sediments further offshore, providing the applicant with confidence in the extrapolation, Eastern IFCA do not consider this provides the required level of confidence to enable impacts

from the development to be properly predicted. The type of seabed is important because the sensitivities of different biotopes varies.

In addition, the assigned biotopes differ considerably from those shown in Natural England's latest feature extent data for the SAC (June 2018 data release) (Figure 1). However, the data used by Natural England to inform the feature extents are also considered low confidence, as they have been taken from broadscale habitat mapping surveys conducted prior to 2000 (Foster-Smith *et al.*, 1999) at a much lower spatial resolution than that required to

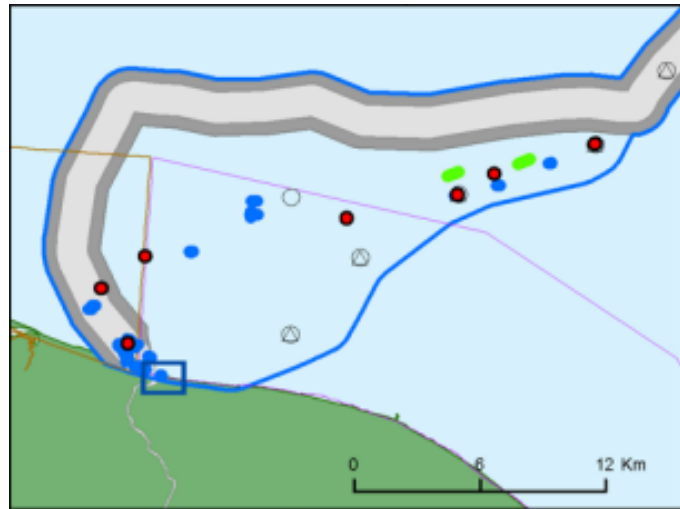


Figure 1: Location of Hornsea Three site specific benthic ecology sampling locations (points: benthic grabs, DDV and trawls) in relation to the re-routed offshore cable corridor. Image taken from Hornsea Project Three Offshore Windfarm Environmental Statement: Volume 2, Chapter 2 – Benthic Ecology.

assess habitats within the cable corridor. The age of the data is important in marine sedimentary environments where changes in characteristic habitat types can occur over relatively short timescales (weeks and months, or even days in extreme cases).

The fact that biotope data have been extrapolated from point data and surveys pre-dating 2000 means there is low confidence in the type of habitat in the nearshore cable area. Therefore, either site-specific surveys should be undertaken to ascertain the actual habitats present, or a precautionary approach should be taken to managing activities in the area to ensure potential impacts on most sensitive habitats cannot occur.

It is relevant to highlight that, because of the low confidence in the habitat data available along the North Norfolk Coast, Eastern IFCA have taken a precautionary approach when applying fishery management measures in this section of the MPA to protect subtidal mixed sediments and subtidal mud. This has resulted in Eastern IFCA proposing a large proposed closure on the North Norfolk Coast (5922 ha) prohibiting towed demersal fishing gears between 0 and 3nm from the shore. This extends an existing closure (Eastern IFCA Byelaw 12) between Blakeney and Mundesley on the North Norfolk Coast, which has the effect of protecting seabed habitats from abrasion or penetration from trawling or dredging (Figure 2).

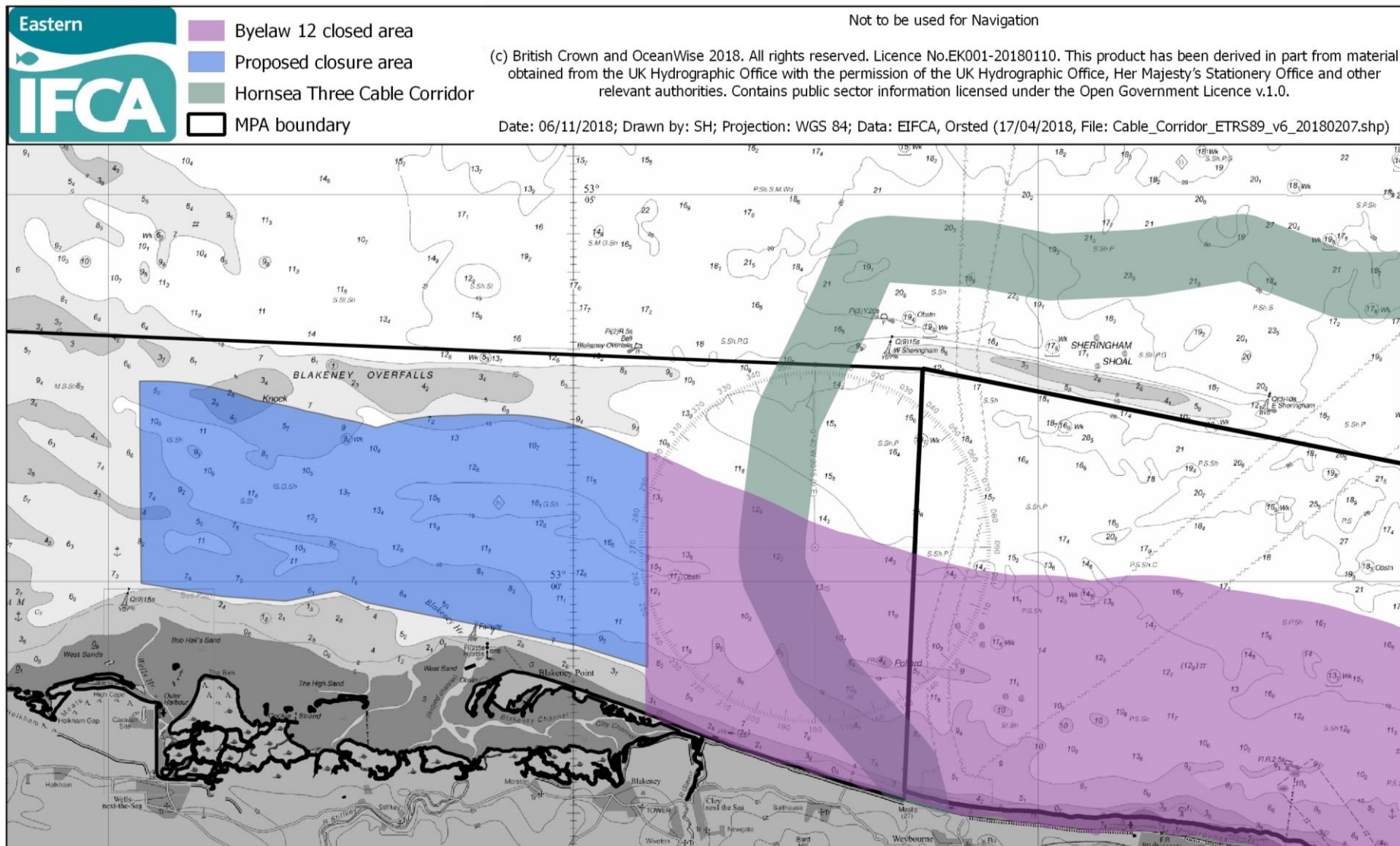


Figure 2: Chart detailing the location of the offshore cable corridor in relation to Eastern IFCA's Byelaw 12 closure area and proposed Marine Protected Areas Byelaw 2018 closure area 31 along the North Norfolk Coast, both to prohibiting bottom towed gears.

To fully assess the impacts of cable installation works on Annex 1 habitat, which include *H1110 Sandbanks which are slightly covered by sea water all the time*, within the SAC a better understanding of the distribution of these habitats is required. Mixed sediments are a sub-feature of subtidal sandbanks (detail provided in statutory conservation advice for the SAC – see Natural England (2018)¹. This seabed type can support a wide range of species that are not found in sandier seabed habitats, which means they have a greater sensitivity to physical disturbance, for example from cable laying or cable protection. In addition, a better understanding of the habitat types and benthic communities is also important when considering cable burial options and the requirement for rock armoring and to provide a baseline for post-construction monitoring surveys.

Since submitting our Relevant Representation, the Applicant has provided Eastern IFCA with additional survey data for the near-shore cable area, gathered during surveys in summer 2018. This includes drop-down video sampling within the section of the cable corridor that coincides within The Wash and North Norfolk Coast SAC. Eastern IFCA consider that the additional data partially to validate the baseline assessment (Clarification Note: Baseline and impacts of cable installation); they support the classification of mobile sediments across the nearshore section of the cable route. However, whilst visual assessments of habitat type can be made using video methods and can contribute to the classification of habitat types, to accurately assess sediment and benthic community composition Eastern IFCA considers that further grab samples should be taken and assessed for particle size and biota. Furthermore, Eastern IFCA's understanding of the habitat in this area is that mobile sediments could overlay subtidal chalk² features. Video assessment of the seabed does not allow an assessment of underlying habitat below the top layer. If large areas of rock or other unsuitable habitat exist, then it is likely that it will not be possible to bury a substantial proportion of the cable within the SAC. This could result in a requirement for rock armoring to protect unburied cable, which would result in a permanent loss of sedimentary habitat in that area.



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<https://designatedsites.naturalengland.org.uk/Marine/MarineSiteDetail.aspx?SiteCode=UK0017075&SiteName=wash%20and%20north%20norfolk&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>

2

<https://magic.defra.gov.uk/MagicMap.aspx?srs=WGS84&startscale=250000.0000000029&chosenLayers=marinesac,sacIndex,lagoonIndex,sacbaysIndex,sacmudPIndex,sacmudIndex,sacsandPIndex,sacsandIndex,sacreefPIndex,sacreefIndex,sacsaltmPIndex,sacsaltmIndex,backdropDIndex,backdropIndex,europaIndex,vmlBWIndex,25kBWIndex,50kBWIndex,250kBWIndex,miniscaleBWIndex&box=-0.23735558880938212:52.743238135063706:0.714428813522741:53.207233031200616&useDefaultbackgroundMapping=false>

Q1.6.2 - Paragraph 6.11.1.54 of the ES [APP-066] states that reduced access or exclusion of the local potting fleet from the offshore cable corridor route would be eligible for justifiable disturbance payments.

Do you agree that the mitigation, as outlined in the Fisheries Liaison with Offshore Wind and Wet Renewables Group guidance, in combination with the proposed Fisheries Coexistence and Liaison Plan [APP-183], would be effective?

Eastern IFCA note and agree that the mitigation outlined in the Fisheries and Liaison with Offshore Wind and Wet Renewables Group Guidance (FLOWW), in combination with the proposed Fisheries Coexistence and Liaison Plan (PINS reference A8.10), would be effective, provided close and continued engagement with the fishing community is maintained. Although EIFCA has a remit to support a viable fishing industry, we do not represent commercial fishing interests. Eastern IFCA would not get involved in discussions about disturbance payments.

Q1.15.14 - Please comment on the Outline Fisheries Coexistence and Liaison Plan [APP-183] and suggest any potential amendments that may, in your view, be required in order to secure appropriate liaison and consultation with the fishing industry

No further amendments required.

Please do not hesitate to contact me should you have any queries on the above response

Yours sincerely,

A solid black rectangular box redacting the signature of Samantha Hornbrey.

Samantha Hornbrey
Marine Science Officer
Eastern Inshore Fisheries and Conservation Authority

References

Foster-Smith R.L., Davies, J. & Sotheran, I., 1999. Broadscale remote survey and mapping of the sublittoral habitats and biota.

