



Mr Prentis
National Infrastructure Planning
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The Wildlife Trust reference: 20010531

BY EMAIL

7 November 2018

Dear Mr Prentis

Examiner's written questions for Hornsea Three offshore wind farm: deadline 1

Thank you for inviting The Wildlife Trusts (TWT) to respond to questions for Hornsea Three Offshore Wind Farm. Our response is outlined below.

Question 1.2.14

TWT's representation [RR-047] states that more realistic expectations of cable burial and protection within The Wash and North Norfolk Coast Special Area of Conservation are required. Please provide further justification for your view that the assessments in the application documents are not realistic.

What reasonable measures should, in your view, be taken to remedy this situation?

Link to q1.2.4 and 1.2.5.

TWT consider that further information is required regarding the impact of the cable route within The Wash and North Norfolk Coast SAC to ensure no adverse effect on integrity. This is for several reasons:

1. Cable burial

There is evidence to suggest that a sediment veneer over rock is present within the cabling route within the SAC. This may increase difficulties in cable burial. The amount of sediment veneer covering rock should be considered in more detail to understand predicted cable burial success.

Our concerns regarding cable burial have increased based on the cable burial failure we have seen in The Wash and North Norfolk Coast SAC for Race Bank Offshore Wind Farm. We have recently responded to a marine licence application for further remedial burial works and cable protection within the SAC for Race Bank Offshore Wind Farm, which we have objected to (MLA/2018/00385). We require certainty that the same issues will not occur for Horsea Three cables within the SAC.

2. Cable protection

If cables cannot be buried, then cable protection will be required. Although the applicant is proposing sensitive cable protection, it will still result in the introduction of a hard substrate in a soft sediment environment. The applicant has calculated that 0.004% of subtidal sandbank will be lost within The Wash and North Norfolk Coast SAC

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due to cable protection. When considering the scale of the impact, the judgement in the *Sweetman* case should be borne in mind. In the *Sweetman* case, it was determined that the removal of just 0.53% of the limestone pavement feature (0.006% of the whole SAC) constituted an adverse effect on site integrity. There are numerous other examples where habitat loss of less than 1% has been shown to constitute an adverse effect on the integrity of a European site¹.

We have concerns regarding the in-combination impacts of the cabling works with other activities within The Wash and North Norfolk Coast SAC. The following activities have not been included in the in-combination assessment, and must be to understand the in-combination effect:

- Race Bank Offshore Wind Farm cabling works – existing infrastructure and new works.
- Linc Offshore Wind Farm cabling routes – existing infrastructure.
- Commercial fishing.

From our understanding, the maximum 10% protection estimate has been made by taking account the amount of cable protection used in other projects. However, the amount of cable protection for Race Bank Offshore Wind farm, located within the same SAC as Hornsea Three cables, appears to be an anomaly and much higher than other projects. We are concerned that Race Bank cables within the SAC will continue to become exposed requiring further cable protection. As stated previously, we require certainty that the same issues will not occur for Horsea Three cables within the SAC.

TWT suggest that the following should be considered to give to give certainty that there will be no adverse effect on The Wash and North Norfolk Coast SAC.

- Certainty that the cable can be buried if a sediment veneer over rock is present. The applicant has informed us that they are confident that they will be able to cut into rock in order to bury the cables. Further information on the confidence in cutting and burial techniques is required, including information from similar activities for other projects. In addition, how much geophysical information of the route within the SAC is available to determine how much sediment veneer over rock there may be within the cable corridor? This information would be useful in providing confidence in the proposed maximum 10% cable protection required within the SAC.
- Due to the issues we have seen with cable burial within the SAC, we would like to understand what the likelihood is of similar problems occurring along the Hornsea Three cable route along the North Norfolk Coast. Due to the dynamics within the Wash, sediment does not remain in situ which has resulted in cable exposure and the requirement for cable protection. Does the applicant expect similar coastal processes within the Hornsea Three cable route which may result in cables becoming exposed and the requirement further cable protection? We are aware that rocky outcrops along the North Norfolk Coast area do become exposed due to the shifting sediment.
- It would be useful if the applicant could provide examples of cable burial success from other cable routes within the area e.g. Dudgeon and Sheringham Offshore Wind Farms. We would like to understand if the cables from these offshore wind farms have become exposed and how much cable protection has been used.

TWT has provided further detail outlining our concerns regarding cabling within The Wash and North Norfolk Coast SAC within our Written Representation.

¹ Hoskins, R. & Tyldesley, D (2006). How the scale of effects on internationally designated nature conservation sites in Britain has been considered in decision making: A review of authoritative decisions. English Nature Research Reports, No. 704

Question 1.2.25

Paragraph 2.7.1.22 of the ES [APP-062] states that no ocean quahog (*Arctica islandica*) were recorded in the Hornsea Project Three area and that only a limited number of juveniles were recorded in the wider Hornsea Zone.

What empirical evidence is there to suggest that the potential impacts on this widely distributed species would be significant?

TWT have discussed the presence of ocean quahog within the Hornsea Three project area in more detail and have no further comments to add.

Question 1.2.32

Paragraph 2.12.2.3 of the ES [APP-062] identifies a number of impacts that have been scoped out of the cumulative impact assessment.

Do you agree with the decision not to assess certain impacts on benthic ecology receptors within this assessment or within the HRA in-combination assessment for the North Norfolk Sandbanks and Saturn Reef Special Area of Conservation?

If not, why not?

We believe that "Maintenance operations may result in temporary seabed disturbances and potential effects on benthic ecology" should not be screened out of the cumulative impact assessment. For some offshore wind farms, we are seeing repeated works to cable routes and the cumulative effect of this with other activities must be taken into account.

Question 1.2.107

TWT [RR-047] considers that fishing activity should be included in the in-combination assessment rather than in the ES baseline.

What is the justification for concluding that the effects of fishing activity are not captured by the current baseline assessment?

Fishing is a licensable activity that has the potential to have an adverse impact on the marine environment. This is supported in the leading case C-127/02 *Waddenzee* [2004] ECR I-7405, the CJEU held at para. 6

"The act that the activity has been carried on periodically for several years on the site concerned and that a licence has to be obtained for it every year, each new issuance of which requires an assessment both of the possibility of carrying on that activity and the site where it may be carried on, does not itself constitute an obstacle to considering it, at the time of each application, as a distinct plan or project within the meaning of the Habitats Directive"

This caselaw demonstrates that fishing is considered a plan or a project and therefore not part of the baseline. Fishing should be included in all in-combination assessments where there is an interaction with a designated feature. In-combination impacts must be taken into account in the same way as if they were removed and the total impact of all human activities considered.

In addition to this, current Defra policy² is to ensure that all existing and potential fishing operations are managed in line with Article 6 of the Habitats Directive. The current, risk-based, 'revised approach' to

² Defra Policy to ensure that all existing and potential commercial fishing operations are managed in line with Article 6 of the Habitats Directive

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/345970/REVISED_APPROACH_H_Policy_and_Delivery.pdf

fisheries management in European Marine Sites is a compromise agreed by all to prevent the closure of fisheries during assessment. This approach further supports that fishing is considered a plan or a project and therefore must be included in the in-combination assessment in line with Article 6(3) of the Habitats Directive.

Please provide further details of the judicial review proceedings you refer to in relation to what you refer to as ‘Dogger Bank Wind Farms’.

On the 3rd September 2015, TWT entered a pre-action letter to the Department for Energy and Climate Change (DECC) against the approval of Dogger Bank Teesside A and B Offshore Wind Farms. This was on the basis that fishing has not been included in the in-combination assessment for Dogger Bank SCI (now SAC). A copy of this letter is included in appendix A.

Who is it that you say gave assurances that fishing would be included in future offshore wind farm assessments?

Assurances were given through verbal discussion with Defra (which involved John Clorley). We have included correspondence in appendix B from George Eustice MP dated 20th October 2015 and our response, dated 22nd October 2015, which highlights the assurances in relation to the inclusion of fishing in future offshore wind farm assessments.

Question 1.2.111

TWT [RR-047] states that the science underpinning underwater noise management is weak, difficult to deliver and does not encourage noise reduction.

Please provide further information on the reasons for your concerns.

In your view, what alternative noise impact mitigation would be effective?

TWT do not agree with the proposed SNCB advice on underwater noise management³. The approach is based upon the carrying capacity of the Southern North Sea SCI. We have no understanding as to what the carrying capacity of harbour porpoise is in the Southern North Sea SCI. Therefore, there is weak scientific information underpinning the proposed area-based approach to management.

The SNCB underwater noise management proposal was discussed at a stakeholder workshop in February 2017 and both developers and regulators highlighted the difficulties in delivering the proposed approach. For example, to ensure that the area-based thresholds would not be breached, a piling schedule would be required for offshore wind farm development. Discussions on how this would be implemented are still ongoing and to our knowledge, no resolution has been found. The lack of progress on underwater noise management not only puts the conservation status of the Southern North Sea SCI at risk, but also future offshore wind farm development, especially due to the in-combination effects of underwater noise.

Due to the difficulties in the deliverability of the current approach and the uncertainty on the scientific evidence base which underpins it, TWT are currently advocating the underwater management approach used in Germany⁴. The approach sets noise limits at which piling activity must not exceed. The noise limits are based upon scientific evidence. This approach ensures that noise emitted from offshore wind farm construction is reduced using methods such as bubble curtains. Germany has stricter noise protection outside their SACs to what is being proposed within UK harbour porpoise SACs. Noise limits are also used in the Netherlands and Belgium.

³ A potential approach to assessing the significance of disturbance against conservation objectives of the harbour porpoise cSACs. Discussion document. Version 3.0. Distributed by JNCC for the noise management in harbour porpoise cSACs workshop 27th February 2017.

⁴ German Sound Protection Concept

http://www.ascobans.org/sites/default/files/document/AC21_Inf_3.2.2.a_German_Sound_Protection_Concept.pdf

Question 1.2.112

TWT [RR-047] considers that management of underwater noise, detailed monitoring of noise levels and harbour porpoise population activity and strategic mitigation and monitoring should be managed at a regional or strategic level.

In your view, how should this application contribute to such activities?

TWT proposes that developers should be conditioned to pay into an underwater noise levy which would fund strategic monitoring and mitigation along with the establishment of a group to coordinate underwater noise management. TWT has produced a draft working document on the underwater noise levy which is included in TWT Written Representation in appendix C. TWT has shared this proposal widely and feedback suggests that there is support for a strategic approach to monitoring but that a mechanism for delivery is lacking.

Question 1.2.114

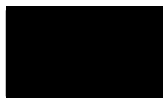
Conditions 11(4) and 11(5) of the Generation Assets DML and 12(4) and 12(5) of the Transmission Assets DML [APP-027] seek to mitigate potential effects on marine mammals from piling operations.

To what extent do you consider that this would be an effective approach?

As the conditions stands in the DML, we do not consider this adequate to conclude no adverse effect. The applicant has shared a copy of the in-principle Site Integrity Plan (SIP) and we are pleased that this commitment has been made. However, the current in-principle SIP lacks details. Further information should be provided on the effectiveness of the proposed mitigation as outlined in the SIP. This should include referenced examples of how the implementation of mitigation will reduce underwater noise disturbance impacts within the SNS SCI. Noise modelling should also be undertaken to demonstrate the degree of noise reduction which could be achieved through mitigation.

Thank you for considering our response. We are happy to provide more detail if required.

Yours sincerely



Joan Edwards
Director, Public Affairs and Living Seas
The Wildlife Trusts

Leigh Day

Secretary of State for Energy & Climate Change
Department of Energy & Climate Change
Kings Buildings
c/o 3 Whitehall Place
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Dear Sir or Madam,

**Letter Before Claim: Re Secretary of State's Approval of Proposed Dogger Bank
Teesside A and B Offshore Wind Farm Order**

Proposed Claimant: The Wildlife Trusts, The Kiln, Waterside, Mather Road, Newark, Nottinghamshire, NG24 1WT (our client)

Proposed Defendant: Secretary of State for Energy & Climate Change

Potential Interested Parties: Forewind Limited, 5th Floor, Davidson House, Forbury Square, Reading, Berkshire, RG1 3EU

Decision under Challenge: Approval of Dogger Bank Teesside A and B Offshore Wind Farm Order

Date of Decision: 4 August 2015

On 4 August 2015, the Secretary of State for Energy and Climate Change granted a Development Consent Order for an Offshore Wind Farm known as 'Teesside A and B'. The Secretary of State's decision was supported by a Habitats Regulation Assessment ('HRA') of the same date.

Dogger Bank is currently a Site of Community Importance ('SCI'), awaiting formal designation as a Special Area of Conservation ('SAC'). It is also a candidate SAC (HRA para. 6.1).

The Habitats Directive requires an assessment of the impact of a proposal upon protected European sites, both individually, and cumulatively with other plans or projects. Article 6(3) provides:

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"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

The sole feature of the SCI ('sandbanks which are slightly covered by seawater all the time' is considered to be in an unfavourable condition (HRA para. 6.4). The proposal subject to the DCO would have a negative impact upon the SCI (HRA paras 6.6ff).

In order to correctly assess the impacts on habitats, it is necessary to correctly identify what constitute 'plans or projects'. During the course of examination of the proposed DCO, Natural England changed its view, to the effect that existing fishing activities are not a 'plan or project' for the purposes of the Habitats Directive.

The HRA states at para. 6.47:

"[Natural England] explained that within 12nm a regulatory mechanism is available, outside 12nm, there is an absence of any regulatory mechanism through which fishing activities are controlled. On this basis, NE explained that whilst it may be possible to extend the approach taken to assessment of fishing activities within 12nm to outside 12nm, due to the absence of a regulatory mechanism, NE and [the Marine Management Organisation] agreed that such an approach may be premature."

This approach is adopted by the Examining Authority ('ExA') at para. 6.50:

"The ExA also considered the advice from Natural England that outside of 12nm there is an absence of regulatory mechanism through which fishing activities are controlled and noted that as fishing on Dogger Bank is not a defined activity, and nor is it a consented or specifically regulated activity, it makes the concept of a meaningful assessment challenging since it has no definable scope and is not monitored. The ExA notes no 'new' fishing activities have been included in the list of other plans and projects considered in the Applicant's in combination assessment, neither did any Interested Parties identify any 'new' fishing activities which should be considered as a plan or project in the in combination assessment. The ExA therefore concluded that

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there was no need to include any new fishing activities on the SCI and concluded no AEoI."

The Secretary of State accepted this reasoning. The Decision states at para. 5.7:

"The Secretary of State's HRA considers the impact of fishing on the Dogger Bank SCI. However, as fishing activity is ongoing and already affecting the ecology of the site and is not something new, fishing is considered as part of the background impacts on the site."

Our client's view is that the advice of Natural England, which has been accepted, makes a false distinction between 'existing' fishing and 'new' fishing. There is no such distinction.

In the leading case C-127/02 **Waddenzee** [2004] ECR I-7405, the CJEU held at para. 28:

"The fact that the activity has been carried on periodically for several years on the site concerned and that a licence has to be obtained for it every year, each new issuance of which requires an assessment both of the possibility of carrying on that activity and of the site where it may be carried on, does not in itself constitute an obstacle to considering it, at the time of each application, as a distinct plan or project within the meaning of the Habitats Directive."

By contrast to Natural England's position, our client's understanding is that there is a fishing licensing regime which extends beyond 12nm. Section 4(1) of the Sea Fish (Conservation) Act 1967 provides that:

"The Ministers may by order provide—
(a) that in any specified area within relevant British fishery limits fishing by fishing boats (whether relevant British fishing boats, Scottish fishing boats or foreign fishing boats) is prohibited unless authorised by a licence granted by one of the Ministers;
(b) that in any specified area outside those limits fishing by relevant British fishing boats is prohibited unless so authorised."

Section 4(5) provides that licences for fishing can confer limited authorisation by references to the area in which fishing is authorised.

Section 4(6ZA) provides:

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"The conditions subject to which a licence may be granted under this section include conditions imposed for the purposes of—

- (a) conserving or enhancing the natural beauty or amenity of marine or coastal areas (including their geological or physiographical features) or of any features of archaeological or historic interest in such areas;*
- or*
- (b) conserving flora or fauna which are dependent on, or associated with, a marine or coastal environment."*

Our client's understanding is that fishing licences are granted for a period of a year. As such, every year a British fishing vessel will require a new licence. At each application, the licensing authority has the opportunity to impose a condition preventing fishing at Dogger Bank on environmental grounds.

The HRA proceeds on the assumption that fishing at Dogger Bank is not a licensed activity. However, Section 4 of the Sea Fish (Conservation) Act applies to relevant British fishery limits. Dogger Bank falls within British fishery limits. Furthermore, the Sea Fish Licensing (England) Order 2015 Article 3(1) establishes the general position that fishing by English fishing boats (wherever they may be) is prohibited unless licenced by the MMO.

The grant of licences to fish, which do not exclude fishing at Dogger Bank (on environmental grounds), means that vessels are granted licences to fish at Dogger Bank. According to **Waddenzee**, the regular grant of licences constitutes a plan or project for the purposes of Article 6(3).

The consequence of licenced fishing at Dogger Bank constituting a plan or project for the purposes of the Habitats Directive is that the proposed development must be considered in combination with the fishing activities.

The Secretary of State's conclusion at para. 9.4 of the Decision is that *"there will be no adverse effects on the integrity of: the Dogger Bank candidate Special Area of Conservation ("cSAC") and Site of community Interest ("SCI")"*. The development will be harmful to the SCI. The SCI is currently in an unfavourable condition due to fishing. As licensed fishing is a plan or project, the proposal must be considered in combination with licenced fishing. In these circumstances, the question of adverse effects on the integrity of the SCI admits of only one answer: there would be adverse effects.

The HRA refers to proposed fisheries management measures at para. 6.43:

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"Fisheries management measures are being developed for the Dogger Bank SCI under the revised Common Fisheries Policy (Articles 11 and 18) (and also for contiguous European member states' SCIs). The proposed fisheries management measures would close one third of the SCI to bottom contacting gear. While the formal approval process is not yet complete, these proposals have been agreed at a technical level by all European member states with SCIs on Dogger Bank but their implementation remains under discussion between relevant member states. Therefore at this time there are no Commission approved fisheries management measures in place..."

These fisheries management measures are referred to further at para. 6.51 of the HRA:

"The ExA considered the advice provided by NE that the magnitude of the effects of the on-going fishery activity have been considered alongside the effects of the application proposal and that, subject to agreed DML conditions and mitigation being implemented, they consider that the effects of the application proposal will not impact upon the trajectory of recovery as and when fishery management measures are adopted."

The fisheries management measures cannot be relied upon to say that there will be no adverse effects on the integrity of the SCI. As the HRA recognises, these are not yet agreed or approved. They cannot be relied upon to deliver improvement to the SCI. A conclusion that there will be no adverse impacts on the basis of the proposed fisheries management measures would be unlawful.

The conclusion that there would be no adverse impacts upon the integrity of the SCI is unlawful, and cannot stand. In these circumstances, our client requests that the Secretary of State consents to the quashing of the DCO.

The DCO is unlawful because, in assessing compliance with the Habitats Regulations, it failed to consider the impacts of the proposed development with the impacts of licensed fishing on Dogger Bank. The in-combination effects of the projects (licensed fishing and the wind turbines) have not been assessed. This exercise is conceptually different from treating the condition caused by fishing as part of the baseline for assessment. Had the projects been assessed in combination it would have been clear that the result is that there will be adverse effects on the integrity of the site, and therefore approval cannot be given without consideration of IROPI and subsequent provision of compensatory measures. To overcome this fundamental flaw in the process, before the turbines could be approved steps to remove or limit the harm by fishing would have to have been introduced.



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Joan Edwards
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20 October 2015

From George Eustice MP

Minister of State for Farming, Food and Marine Environment

Dear Joan

I am writing to you to reiterate my commitment to ensuring appropriate measures to limit damaging fishing activity in the Dogger Bank Site of Community Interest are progressed.

I am as disappointed as the Wildlife Trusts that the fishery measures designed to protect the Dogger Bank from damaging fishing activity largely agreed at official level between Germany, Netherlands, Denmark and the United Kingdom back in 2013 have not yet been submitted to the Commission for adoption through the Common Fisheries Policy process. As you are aware, this delay has not been caused by my Department, but is a result of further deliberations within other countries, in particular, The Netherlands. I can assure you that opportunities have been taken to stress our concerns over the delay to the Member States concerned.

I am pleased to report that since the 14 October meeting between the Wildlife Trusts my Department and DECC, the Dutch Government has agreed to meet next month with the other relevant Member States with a view to agree a process to take forward the proposed measures. I am hopeful that this will mean that real progress on delivering the measures will be taken. However, if further delays occur, I will raise this with the relevant Member States' Ministers and the European Commission. If progress is still delayed the option of taking forward measures for the UK proportion of the site could also be considered.

I hope this provides you with the information and reassurance you are seeking. I believe that the UK is at the forefront of identifying and delivering fishery measures for both inshore and offshore Marine Protected Areas, and our commitment to establishing measures in respect of the Dogger Bank site area is a part of this overall programme.

I will ensure that you are kept up to date on the progress of the Dogger Bank measures.


GEORGE EUSTICE MP



Mr George Eustice MP
Minister of State
Department for Environment, Food and Rural Affairs
Nobel House
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22 October 2015

Dear Minister,

RE: Implementation of fisheries management measures on Dogger Bank

Thank you for your letter dated 20th October 2015 regarding the implementation of fisheries management measures on Dogger Bank. In light of this letter and other correspondence between ourselves and your Department, we are prepared to withdraw our claim for Judicial Review (JR) of the Dogger Bank Teesside A&B wind farm Development Consent Order (DCO). Our basis and reasons for this are set out below. In coming to our decision, we have also had regard to the response to our pre-action protocol letter from the Government Legal Department, dated 14th October 2015 and attached with this letter. Please also note our comments in response to this letter in Annex 1.

Notwithstanding our position as set out in Appendix 1, we have decided to withdraw the claim for JR, following several productive discussions with both the Department for Environment, Food & Rural Affairs (Defra) and the Department of Energy & Climate Change (DECC), which have led to a number of key assurances being given that satisfy our concerns. We have been pleased with the manner in which our claim has been addressed by Defra in particular and the seriousness with which your Department has addressed our concerns.

As has been widely discussed, our overarching objective in bringing this claim was not to prevent the construction of the wind farm. Firstly, it was to ensure that a designated site, which is already in unfavourable condition, did not have further pressure added to it, in the form of the wind farm, without initially reducing an existing pressure (namely, fishing). By not considering fishing as a 'plan or project', we believe that its impacts on the site were not adequately taken into consideration. At the same time, we felt that further commitment from the UK government to reduce the fishing pressure could alleviate this concern. Secondly, it was to ensure that due consideration would be given to treating fishing as a 'plan or project' in any future Habitats Regulations Assessment, in line with Defra's revised approach to fishing, so that a similar scenario that has occurred with Dogger Bank does not happen again.

With regard to the first intention, we are satisfied by the commitments set out in your letter dated 20th October 2015. It will be preferable for all concerned if a



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multilateral agreement on fisheries management can be reached between all relevant Member States. As you know, the joint proposal for fisheries management has been several years in the making, but is yet to be fully implemented. However, given the considerable delays which this process has faced, we are pleased to see your commitment to raising this with the Member States and European Commission if further delays occur. We also welcome your further commitment to consider taking forward measures for the UK site if the process is further delayed. We believe that the provision in Article 11(4) of the Common Fisheries Policy would give the UK the justification to proceed with unilateral measures, if a joint recommendation is not forthcoming. We hope to hear of real progress with the joint recommendation in the coming months. We will continue discussions with your Department as to how this is progressing and the steps to be taken if progress is further delayed.

With regard to the second intention, from correspondence and discussion with members of your Department, we are pleased to note that steps are being put in place to ensure that this situation does not happen again. To this end, we welcome further discussion between Defra and DECC about consideration of fishing activity in future applications for offshore industry developments. We would be happy to be a part of these discussions and would like to be kept informed of their progress. Through our ongoing work we will continue to be engaged with offshore industry developments (both renewables and fishing). We would expect that this scenario will now not occur again and will not hesitate to follow a similar course of action if it does.

Having resolved our key concerns, the only further achievement in pursuing the claim for JR would be the potential quashing of the wind farm DCO. Whilst accepting that the wind farm will have a number of impacts on the marine environment as a whole, we do not fundamentally object to the development of the wind farm and hence are content to withdraw the claim.

We thank you for the time you and your Department have put into resolving this issue. We look forward to working with both Defra and DECC to ensure both the swift implementation of fisheries management measures on Dogger Bank and truly sustainable development in our offshore environment.

Kind regards,



Joan Edwards
Head of Living Seas
The Wildlife Trusts