

Hornsea Project Three Offshore Wind Farm Team,
Secretary of State for Business, Energy and Industrial Strategy,
c/o the Planning Inspectorate,
3D Eagle Wing,
Temple Quay House,
Temple Quay,
Bristol,
BS1 6PN

cc. Orsted Hornsea Project Three (UK) Limited

Your Refs: EN010080

Our Ref:

22 April 2020

Dear Sir/Madam,

Application by Orsted Hornsea Project Three (UK) Limited (“the Applicant”) for an Order granting Development Consent for the proposed Hornsea Project Three Offshore Wind Farm and associated offshore and onshore infrastructure

Re. REQUEST FOR COMMENTS ON NEW INFORMATION PROVIDED BY THE APPLICANT

Thank you for this invitation to comment on new environmental information provided by the Applicant in response to the previous consultation on late representations. Eastern IFCA had submitted two responses to that consultation, dated 10th December 2019 and 13th February 2020.

Having reviewed documents presented by the Applicant, Eastern IFCA would like to confirm its previous position in relation to potential compensatory measures. This position is that Eastern IFCA are supportive in principle of two potential compensatory measures (one relating to restoration of mussel beds and one relating to removal of marine litter including lost fishing gear), subject to full feasibility assessments being conducted and subject to the Applicant providing funding for them. We have emphasised to the Applicant, and wish to emphasise to you that the mussel restoration work must relate to inter-tidal, not subtidal (sublittoral) mussels.

Similarly, Eastern IFCA would be supportive in principle of the proposed marine litter/ghost fishing reduction programme for Cromer Shoal Chalk Beds Marine Conservation Zone, again subject to a full feasibility assessment and Applicant funding.

Eastern IFCA would not be supportive of compensatory measures (or measures of equivalent environmental benefit or MEEB) that restrict fishing opportunities.

The Applicant reports that Natural England's conservation advice records that some components of sandbank features in the Wash & North Norfolk Coast Special Area of Conservation (SAC) are in unfavourable condition because of fisheries and cabling. Eastern IFCA considers that there should be recognition in the information presented by the Applicant that Eastern IFCA has agreed measures (in this case, areas closed to towed demersal fishing and technical/effort restrictions on fishing gear used in open areas), in full dialogue with Natural England, towards ensuring favourable condition of this SAC.

We would also like to re-iterate our concerns that the export cable is planned to cross an area of this SAC that our Authority has agreed to close to demersal fishing, to protect designated habitats of the SAC. These habitats are sub-features of subtidal sandbanks. However, we defer to Natural England as the statutory nature conservation advisor to advise on whether the proposed compensatory measures are appropriate to compensate for damage to these sub-features, in terms of the requirements of the Habitats Regulations.

Finally, we note that Eastern IFCA has been referred to by the Applicant as "Eastern Inshore Fisheries and Conservation Agency". The correct title is "Eastern Inshore Fisheries and Conservation Authority", which reflects that we are a regulating authority with a fisheries and conservation remit.

Please do not hesitate to contact me should you have any queries on this response.

Yours sincerely,

Judith Stoutt

Judith Stoutt
Senior Marine Science Officer
Eastern Inshore Fisheries and Conservation Authority