

THANET FISHERMEN'S ASSOCIATION.



05.02.19

Thanet Extension Offshore Windfarm. Planning Inspectorate-Application by Vattenfall Wind Power Ltd for an Order Granting Development Consent.

Dear Sir/Madam,

Please see comments below on documents entered 21.01.19.

Thanet Fishermen's Association comments on EN010084-000943-Kent and Essex IFCA - Statements of Submission from other person.

KEIFCA are concerned over the loss of fishing grounds and the impact that displaced fishing activity may have to the surrounding area. Information regarding the area's most likely to experience increased fishing pressure due to displacement was not provided in the ES and should undergo further consideration.

TFA supports the concerns of KEIFCA regarding displaced Fishing activity and would add that, for Lobster and Crab potters in particular, displacement is a serious concern as alternative grounds are already fully fished. The increase in volume of pots across the small amount of ground remaining, and the increase in pressure on that ground will be significant. We would also point out that the loss of specific grounds within the RLB cannot always be mitigated simply by fishing elsewhere.

TFA would also support the comments made by the IFCA regarding cumulative impact and the inclusion of post construction projects, in particular with regard to cumulative impact on loss of ground.

Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm. Appendix 1 of the Deadline 1

Submission: Applicant's Responses to the Relevant Representation. EN0 10084-001077

Marine Management Organisation: MMO 152. Issue raised 6.29: TFA supports the MMO comment on the Succorfish data and the loss or restricted access to traditional Fishing grounds.

The MMO suggestion that there is a moderate amount of overall potting activity within the Extension area is partly correct. Lobster and Whelk Potters work the area within the RLB consistently but notably a large proportion of Lobster and Crab landed into Ramsgate comes from that area, so the impact on this group of potters is even more significant. The applicant response is that *'The Succorfish data was reviewed and considered in detail within the assessment. It is considered a minor proportion of local potting that occurs within the project boundary will have a loss of access.'* TFA does not consider the magnitude of this impact has been properly assessed. From the point at which UXO or any pre-construction works begin until post construction, the Crab and Lobster potters will be fully restricted in their access to these grounds. Post construction, the return of the potters will be limited dependent upon the final layout and the ground lost with each turbine footprint and safety zone. We would also question how realistic it will be to work the current volume of pots once there are crew transfer vessels maintaining the turbines.

MMO 154. Issue raised 6.31: The MMO comments on the use of alternative grounds and advises caution regarding the relocation of gear and the capacity of alternative grounds. TFA would support this comment. The Applicant responds that there is no reference to alternative grounds in Volume 2, chapter 6, Fish and Shellfish Ecology. We would point out that the reference to 'alternative' fishing grounds being shown by Succorfish data, is within Annex 9-1: Commercial Fisheries Technical Report at 3.3.9. TFA disagrees with the Applicants response that fishing pressures within and outside the array is negligible, due to the limited alternative ground available for specific methods at specific times. The pressure on other grounds will increase significantly.

MMO 163. The MMO comments on the Fisheries Liaison and Co-Existence Plan and the Applicant response states that the FLO for construction is unknown at this time. The FLO currently being used by the applicant is a member of TFA and an ex Fisherman from the area. This is recognized in the FLCP at point 3.3. TFA is in ongoing discussions with the applicant regarding the FLCP and will ask that the choice of onshore and offshore FLO's going forward must be with the agreement of TFA and be recognized within the FLCP.

Please accept the comments above in conjunction with our written representation and on behalf of our members.

Yours sincerely,

Secretary TFA: Thomas H Brown
Chairman TFA: Peter J Nichols
Treasurer TFA: Merlin W Jackson.