

Application by Norfolk Boreas Limited for an Order Granting Development Consent for Norfolk Boreas Offshore Wind Farm Project

Deadline 4 Submission by the Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA)

Written submission for Action Point 4 arising from the issue specific hearing on offshore effects on the 22nd January 2020

30th January 2020



On the Planning Inspectorate request to understand whether assessment of the magnitude of effects on fisheries should be based on a percentage loss of access to grounds and whether cumulative impact assessment of past losses or restrictions of access to fishing grounds would represent double counting

At Deadline 2 the National Federation of Fishermen's Organisations (NFFO) set out a case for quantitatively assessing the effects of offshore wind developments on commercial fisheries. NFFO highlighted the lack of specificity in the sensitivity criteria used in the Commercial Fisheries Assessment for Norfolk Boreas, in particular in relation to what constitutes 'limited', 'moderate' and 'extensive' operational range and what constitutes an ability of vessels to exploit a 'number of fishing grounds'.

The NFFO suggested using percentage loss of access to grounds to create straightforward magnitude criteria that could form the basis of a more quantitative impact assessment. While we agree with the developer that they have adequately characterised the potential impacts in this instance for the inshore fisheries within the Eastern IFCA district, Eastern IFCA consider that using quantitative measures to inform impact assessments would be sensible.

Quantitative and qualitative assessment approaches each have their advantages and disadvantages. As outlined by the NFFO, the current qualitative assessment lacks specificity, however the use of quantitative measures would come with the challenges of quantifying access and potential losses to fishing grounds for fishers that operate within a wide range of business models. It can be difficult to define and identify the extent of fishing grounds because of environmental and biological factors as well as commercial confidentiality and individual working practices/preferences. Records exist for vessels that use VMS (although accessing such data can prove challenging in itself due to commercial sensitivity and confidentiality). To date, vessels under 12 m do not use VMS, although there are plans for the application of inshore VMS to all commercial fishing vessels. Despite the outlined challenges, Eastern IFCA consider that if used in combination, supplementing current assessment techniques with quantitative approaches (such as calculating percentage loss of access to grounds) could lead to a more reliable and accountable assessment.

As well as quantifying anticipated loss of access to grounds, Eastern IFCA consider it appropriate to assess recent losses to fishing grounds from resulting from offshore activity (for example from offshore energy projects and aggregate extraction activity) and regulatory requirements (for example areas closed to fishing for conservation purposes). To ensure a thorough assessment, we would suggest looking at the ten

years before the planned start of construction and assessing changes in access to fishing grounds that have occurred during that time. Eastern IFCA are acutely aware of the increasing pressures on fishers and the displacement of effort that results from the proliferation of offshore activity in combination with the increasing number of spatial restrictions being introduced by fisheries managers.

When introducing byelaws (such as the Marine Protected Areas Byelaw 2019 discussed in our submissions for this examination), Eastern IFCA produce full economic impact assessments for consideration by the Authority, the MMO, the Secretary of State for the Environment, Fisheries and Rural Affairs and stakeholders. These use best available evidence (including MMO landings data and available information on fishing intensity) to determine a proportion of total catch likely to be affected by the spatial closures and to estimate the monetary value of closures. Typically, we produce a 'low', 'high' and 'best' estimate of costs and quantify these in monetary terms as far as possible. The range of estimates relies on a combination of quantitative and qualitative information. These assessments also consider potential displacement impacts and knock-on effects of closures to other fishing grounds and stakeholders.

Eastern IFCA would very much like to see approaches to impacts assessment become more consistent between regulators of fishing and non-fishing activities. Introducing quantitative impact measures into assessments would be a good start to transitioning towards a more consistent approach.