

Norfolk Boreas Offshore Wind Farm

Statement of Common Ground

**National Association of Producer
Organisations in Dutch Demersal
Fisheries (VisNed) and National
Federation of Fishermen's
Organisations (NFFO)
(Version 2)**

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Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
FLCP	Fisheries Liaison and Co-existence Plan
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
HDD	Horizontal Directional Drilling
LiDAR	Light Detection and Ranging
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MSFD	Marine Strategy Framework Directive
MPA	Marine Protected Area
NFFO	National Federation of Fishermen's Organisations
OFTO	Offshore Transmission Owners
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
VisNed	National Association of Producer Organisation in Dutch Demersal Fisheries

Glossary of Terminology

Array cables	Cables which link wind turbine to wind turbine, and wind turbine to offshore electrical platforms.
Landfall	Where the offshore cables come ashore at Happisburgh South.
Norfolk Boreas Site	The Norfolk Boreas wind farm boundary. Located offshore, this will contain all the wind farm array.
Offshore cable corridor	The corridor of seabed from the Norfolk Boreas site to the landfall site within which the offshore export cables will be located.
Offshore electrical platform	A fixed structure located within the Norfolk Boreas site, containing electrical equipment to aggregate the power from the wind turbines and convert it into a suitable form for export to shore.
Offshore export cables	The cables which transmit power from the offshore electrical platform to the landfall.
Offshore project area	The area including the Norfolk Boreas site, project interconnector search area and offshore cable corridor.
Offshore service platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead.
Project interconnector search area	The area within which project interconnector cables would be installed.
The Applicant	Norfolk Boreas Limited has made an application for development consent for the Norfolk Boreas Offshore Wind Farm. Therefore, Norfolk Boreas Limited is the Applicant.
The Project	The Norfolk Boreas Offshore Wind Farm

1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared between the National Association of Producer Organisations in Dutch Demersal Fisheries (VisNed), the National Federation of Fishermen Organisations (NFFO) and Norfolk Boreas Limited (hereafter 'the Applicant') to set out the areas of ongoing discussion and disagreement in relation to the Development Consent Order (DCO) application for the Norfolk Boreas Offshore Wind Farm (hereafter 'the project'). A full description of the project can be found in Chapter 5 of the Environmental Statement (ES). Document reference 6.1.5 of the Application, APP-218.
2. This SoCG has been structured to reflect the topics of interest to VisNed and NFFO with regard to the Norfolk Boreas DCO application (hereafter 'the Application'). Topic specific matters agreed and those of ongoing discussions between VisNed, NFFO and the Applicant are outlined in section 2.
3. The Applicant has had regard to the Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.

1.1 Consultation with the NFFO and VisNed

4. This section briefly summarises the consultation that the Applicant has had with VisNed and the NFFO. For further information on the consultation process please see the Consultation Report (document reference 5.1 of the Application, APP-027).

1.1.1 Pre-Application

5. The Applicant has engaged with VisNed and the NFFO concerning the project on multiple occasions during the pre-application process, both in terms of informal non-statutory engagement and formal consultation carried out pursuant to Section 42 of the Planning Act 2008. Due to similarities between the Norfolk Boreas project and its 'sister' project Norfolk Vanguard, which is being developed one year ahead of Norfolk Boreas, early consultation with stakeholders was conducted for both projects concurrently. Although latterly, consultation has been undertaken separately for the two projects, Norfolk Boreas has had regard to the Norfolk Vanguard consultation and many of the agreements achieved for the Norfolk Vanguard project also apply to the Norfolk Boreas project.
6. During formal (Section 42) consultation, VisNed and the NFFO provided comments on the Norfolk Boreas Preliminary Environmental Information Report (PEIR) by way of letters dated 7th and 10th December 2018.

7. Table 1.1 and Table 1.2 provide an overview of meetings and correspondence undertaken during the pre-application stage with VisNed/the NFFO.

Table 1.1 Summary of Pre-Application Consultation with VisNed

Date	Contact Type	Topic
Pre-Application		
14/02/2017	Meeting	Discussions around Dutch fishing activity in the Southern North Sea.
02/05/2018	Email	Link to project website and invite to consultation.
20/06/2018	Meeting	Presentation of project details and commercial fisheries data.
07/12/2018	Letter	VisNed's letter outlining their comments on the PEIR.

Table 1.2 Summary of Pre- Application Consultation with the NFFO

Date	Contact Type	Topic
Pre-Application		
22/06/2016	Meeting	Introduction to the Norfolk Boreas and Norfolk Vanguard projects.
05/04/2017	Meeting	Discussions on activities of Anglo-Dutch vessels in the Southern North Sea.
25/05/2018	Email	Link to project website and invite to consultation.
14/08/2018	Conference Call	Presentation of project details and commercial fisheries data.
10/12/2018	Letter	NFFO's letter outlining their comments on the PEIR.

1.1.2 Post-Application

8. The NFFO and VisNed submitted relevant representations for the Norfolk Boreas project on 17th July 2019 and 1st September 2019, respectively (RR008 and RR113). In addition, the Applicant consulted with VisNed on 11th September and with the NFFO on 12th September by means of two separate conference calls. During these calls VisNed and the NFFO noted their preference to pursue a joint SoCG with the Applicant rather than individual SoCGs.
9. A summary of the post-application consultation undertaken with VisNed and the NFFO to date is given in Table 1.3 and Table 1.4.

Table 1.3 Summary of Post-Application Consultation with VisNed

Date	Contact Type	Topic
Post-Application		
01/09/2019	Relevant Representation	<p>VisNed's relevant representation submitted to the Planning Inspectorate.</p> <p>Key issues of concern raised in VisNed's relevant representation included:</p> <ul style="list-style-type: none"> • Loss of fishing grounds/access to fishing; • Cumulative impacts; and • Approach to monitoring and mitigation, including considerations with regard to snagging risk and liaison.
11/09/2019	Call	<p>Project update.</p> <p>Discussion on how comments made in relation to the PEIR by VisNed were addressed in the ES.</p> <p>Confirmation of VisNed's preference to pursue a SoCG jointly with the NFFO.</p>
25/02/2020	Email from the Applicant	<p>Project and examination update.</p> <p>Circulation of information with regards to changes in the project design envelope, particularly the removal of the 10MW and 11MW turbine options and the associated changes in parameters of relevance to commercial fishing (i.e. decrease in total number of turbines and increase in minimum spacing).</p> <p>Circulation of draft updated SoCG for submission at Deadline 6 for VisNed's review, incorporating reference to the updated design envelope.</p>

Table 1.4 Summary of Post-Application Consultation with the NFFO

Date	Contact Type	Topic
Post-Application		
17/07/2019	Relevant Representation	<p>NFFO's relevant representation submitted to the Planning Inspectorate</p> <p>NFFO noted in their relevant representation their intention to pursue a SoCG with the Applicant, which together with the Applicant's documentation would inform any detailed representation that they may wish to make.</p>

Date	Contact Type	Topic
12/09/2019	Call	<p>Project update.</p> <p>Discussion on how comments made in relation to the PEIR by the NFFO were addressed in the ES.</p> <p>Confirmation of the NFFO's preference to pursue a SoCG jointly with VisNed.</p> <p>NFFO agreed to provide a summary of key issues of concern to help inform the draft SoCG.</p>
06/11/2019	Email	<p>NFFO provided feedback in relation to key aspects for discussion in the SoCGs, including reference to issues in relation to:</p> <ul style="list-style-type: none"> • Assessment Methodology; • Worst Case Scenario; • Cumulative Assessment; and • Mitigation and Monitoring, including considerations with regards to snagging risks and other aspects such as funding arrangements.
25/02/2020	Email from the Applicant	<p>Project and examination update.</p> <p>Circulation of information with regards to changes in the project design envelope, particularly the removal of the 10MW and 11MW turbine options and the associated changes in parameters of relevance to commercial fishing (i.e. decrease in total number of turbines and increase in minimum spacing).</p> <p>Circulation of draft updated SoCG for submission at Deadline 6 for NFFO's review, incorporating reference to the updated design envelope.</p>

2 STATEMENT OF COMMON GROUND

2.1 Introduction

10. The SoCG presented in this section takes account of specific issues raised during consultation undertaken in respect of the project as well as previous discussions and agreement reached between VisNed/the NFFO and the Applicant during the examination phase of the Norfolk Vanguard Offshore Wind Farm.
11. Aspects agreed between VisNed/the NFFO and the Applicant as part of the Norfolk Vanguard Offshore Wind Farm which are also of relevance to the project are outlined in Table 2.1. together with additional agreements reached during post-application consultation for the Norfolk Boreas project.
12. VisNed's/the NFFO's key concerns and position in relation to outstanding areas of disagreement are described in section 2.2 followed by the Applicant's position.

Table 2.1 Aspects agreed between VisNed/the NFFO and the Applicant

Topic	
Existing Environment	The parties agree that the baseline characterisation with regards to commercial fishing provides a practical basis for undertaking the environmental impact assessment (EIA).
Assessment Methodology	The parties agree that the list of impacts included in the assessment of commercial fisheries is appropriate.
	The parties agree that with the removal of floating foundations and the removal of the 9MW wind turbine generators option from the project design envelope, the worst-case scenario presented in the ES has improved compared to that considered for assessment in the Preliminary Environmental Information Report (PEIR).
Mitigation and Monitoring	The parties agree that appropriate communication will be made to the fishing industry in advance of initiating construction safety zones. Provisions for this will be made in the FLCP, including protocols for the relocation of static gear.
	The parties agree that standard procedures as outlined in Fisheries Liaison Offshore Wind and Wet Renewables Group (FLOWW) guidance will be used to establish suitable arrangements for attributable gear damage.
	The parties agree that the reburial approaches or back filling should be considered in the first instance as a way of avoiding the need for new areas of cable protection. Where cable protection is proposed consideration should be given to options that minimise the potential for snagging risks.

2.2 Outstanding Areas of Disagreement

2.2.1 Assessment Methodology

2.2.1.1 VisNed's/the NFFO's Position

13. The methodology used for assessment of potential impacts on commercial fisheries needs to be defined in a more quantitative way. This is particularly the case for the definitions used under sensitivity which lack clarity over what constitutes limited, moderate and extensive operational range and dependence upon the number of fishing grounds.
14. VisNed/the NFFO suggest that the impact magnitude should be measured as a percentage of the loss of access to grounds.
15. VisNed/the NFFO also note that aggregating the assessment by nation and gear groupings means that it is not possible to assess impact at the level of individual businesses. The ability of individual businesses or sub-groupings of vessels to be able to relocate to alternative grounds is therefore not assessed.
16. With regards to safety issues for fishing vessels during the operational phase VisNed/the NFFO note that there is no assessment of the probability of safety issues occurring included in ES Chapter 14 Commercial Fisheries (Document reference 6.1.14, APP- 227).

2.2.1.2 Applicant's Position

17. The assessment of commercial fisheries follows an impact significance matrix approach taking account of receptor sensitivity and impact magnitude. This is in line with standard Environment Impact Assessment (EIA) methodologies (as outlined in ES Chapter 6 Environmental Impact Assessment Methodology, Document reference 6.1.6, APP -219) and the methodology used for assessment of commercial fisheries for other projects, including Norfolk Vanguard.
18. Fisheries receptors are identified by national fleet and fishing method, in line with available fisheries data. Consequently, the impact assessment is undertaken on that basis. As noted in Chapter 14 Commercial Fisheries, due to data limitations, it is beyond the scope of the EIA to assess impacts on individual vessels. It is however recognised that the level and distribution of fishing activity and dependence on fishing grounds within the offshore project area will vary between individual vessels within the same fleets.
19. The identification of sensitivity is based on parameters such as operational range, versatility (ability to deploy/target various species) and availability of grounds. In defining magnitude consideration is given to the area affected by the potential impact and the duration of the impact. The level of fishing activity that the offshore project area

sustains is considered in the context of its relative importance to the overall grounds and the level of fishing which the overall grounds support.

20. Where Norfolk Boreas poses a potential safety risk to fishing vessels, the sensitive/magnitude matrix approach is not considered appropriate. In these instances, impacts are assessed in terms of potential risks. Following this approach, risks are defined to be within acceptable limits or outside of acceptable limits. Due consideration is given in the assessment of safety risks to the measures proposed by the project to minimise potential interactions between the project and fishing, including snagging risk.

2.2.2 Worst Case Scenario/Access to Fishing

2.2.2.1 VisNed's/the NFFO's Position

21. Based on the information presented in the Environmental Statement the worst-case scenario should account for 10MW turbines spaced 720m apart with TetraBase foundations radially extending 35m from the centre point of the turbine so actual theoretical minimal fishable spacing is 650m. However, as it would not be safe to fish up to the foundation bottom and acknowledging the application of advisory safety zones of 50m radius then the theoretical minimum spacing falls to 620m if measured from turbine centre or 550m if measured from edge of TetraBase structure.
22. Since the submission of the ES noting a change in the minimum spacing between turbines (from 720m to 800m) and in the width of corridor left clear of infrastructure (from 650m to 730) associated with this change in project design envelope, with the application of advisory safety zones of 50m radius then the theoretical minimum spacing falls to 700m if measured from turbine centre or 630m if measured from edge of each TetraBase structure.
23. VisNed /the NFFO consider that the assessment of loss of grounds during the operational phase would benefit from having greater transparency over what extent different fishing activities are expected to be able to operate within the array area. In addition, VisNed/the NFFO query how safety zones have been factored into the assessment of loss of grounds/access during the operational phase.
24. VisNed considers that the minimum spacing within operational wind farms to facilitate fishing activity to resume is at least 1km in the case of beam trawlers and at least 2km in the case of seine netters.
25. The Safety Zone statement refers to the use of 500m safety zones around Service Operation Vehicles (SOV) for maintenance activities (3.5, p6). The use of SOVs has not been described so that the potential impacts of 500m safety zones can be understood. Our understanding of their use in other wind farms is for routine maintenance works with SOVs triggering safety zones potentially several times a day which could be

disruptive to any fishing activities occurring in the site. To our knowledge to date a 500m safety zone for such purposes has been granted for the Hornsea 1 offshore wind farm and a 150m safety zone has been granted for the Race Bank offshore wind farm.

26. In light of the legal protection afforded to cables against wilful damage or damage, and actions on behalf of the cables industry representative body, the European Sub-sea Cables Association, warning of an increasing interest among the industry to seek prosecution in the event of damage occurring, NFFO/VisNed request that Vattenfall clarify under what circumstances it would regard damage resulting from fishing activity to be the result of a wilful intent or negligence on the part of a fishing vessel operator. This is relevant to considering the level of access to fishing activities that may take place.

2.2.2.2 Applicant's Position

27. The assessment of loss of grounds in all instances takes account of the project's worst - case design parameters (maximum number of turbines (180 x 10MW turbines), minimum spacing between turbines (720m) and minimum width of corridor clear of infrastructure (650m)).
28. The Applicant notes that since the submission of the ES the project design parameters have been reviewed and the 10MW and 11MW turbine options are no longer being considered, with the smallest turbine option currently proposed being 11.55MW. This would result in a reduction in the worst-case maximum number of turbines from 180 (10MW option) to 158 (11.55MW option). There would be an increase of 80m in the minimum spacing between turbines (from 720m to 800m) and in the width of corridor left clear of infrastructure (from 650m to 730) associated with this change in project design envelope.
29. There is currently no legislation in the UK preventing fishing from occurring within operational wind farms. The level of fishing activity which may resume within the operational Norfolk Boreas Site will therefore largely depend on the perception of individual skippers with regard to operating fishing gear within the Norfolk Boreas Site.
30. With the above in mind, under the assessment of loss of grounds in respect of beam trawling by Anglo-Dutch and Dutch vessels, impact magnitude was considered to range from low to medium, depending on the level of activity that may resume within the Norfolk Boreas Site (low where skippers resume fishing in the Norfolk Boreas Site and medium where skippers elect not to fish within the Norfolk Boreas Site).
31. In the case of seine netting, the assessment considered that, under the worst-case design parameters, there is little potential for activity to be able to resume within the Norfolk Boreas Site. Therefore, the worst case assumption is that seine netting will not be undertaken within the Norfolk Boreas Site during operation.

32. The potential need for safety zones around maintenance works was noted as part of the assessment of loss of grounds during operation. In this context it is important to note that safety zones would only be required in relation to major maintenance works¹ and therefore, any loss of grounds associated with this would be very localised and short term.

2.2.3 Cumulative Impact Assessment

2.2.3.1 VisNed's/the NFFO's Position

33. VisNed/the NFFO do not agree that existing projects are part of the existing environment to be included in the baseline, and note that the current approach used for assessment of cumulative impacts assumes that the fleet has perfectly adapted to the impacts assessed in previous projects. In addition, they state that the cumulative assessment does not consider profitability or revenues. Visned/the NFFO consider that the cumulative impact assessment should examine past losses as well as predicted future losses in percentage terms.

34. VisNed/the NFFO query what assumptions have been made with regards to access for fishing for other projects as well as the worst-case considerations and evidence on which the assessment is based. To date there is no significant evidence that towed fishing activities have returned to fishing among wind farm arrays. VisNed/the NFFO therefore consider on a precautionary basis that a worst-case assumption should be applied to the CIA that no towed gear fishing activities will resume within operational offshore wind farms.

35. VisNed/ the NFFO also query whether the Marine Protected Areas (MPAs) indicated by VisNed/ the NFFO as of concern, and closures in Dutch waters associated with the Marine Strategy Framework Directive (MSFD) have been given consideration in the cumulative assessment.

2.2.3.2 Applicant's Position

36. The cumulative assessment follows the standard EIA methodology used for assessment of impacts for the project alone.

37. Existing projects are considered to represent part of the baseline environment within which commercial fishing activity already occurs. Including existing projects in the

¹ 'Major Maintenance Works' means works relating to any renewable energy installation which has become operational, requiring the attachment to, or anchoring next to, such an installation of a self-elevating platform, jack-up barge, crane barge or other maintenance vessel as per The Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007.

assessment would therefore represent double counting of their effect. With this in mind, existing plans and projects have not been considered for assessment of potential impacts on commercial fisheries.

38. As noted in Chapter 14 Commercial Fisheries, with regards to access to fishing within wind farm sites, in general terms the cumulative assessment notes that fishing would be able to resume with the exception of projects in countries where fishing within wind farms is prohibited. In the case of seine netting, the assumption is made that given the dimensions of the gear used, it would be highly unlikely for this method to resume in operational sites, regardless of whether or not fishing is permitted within wind farm arrays.
39. Consideration has been given in the assessment to proposals for closed areas to fishing associated with MPAs and MSFD measures, as detailed in the information provided by VisNed/ the NFFO during the examination phase of the Norfolk Vanguard Offshore Wind Farm.

2.2.4 Mitigation and Monitoring

2.2.4.1 Snagging Risk

VisNed's/the NFFO's Position

40. VisNed/the NFFO note their preference for inter-array cable planning to minimise crossing predominant fishing tows, hence reducing potential for cable- fisheries interactions, including snagging risks.
41. In addition, VisNed/the NFFO would like to see the following matters accounted for in order to minimise fishing gear snagging risks:
- The cable burial plan should be consulted on with the fishing industry.
 - The results of post-burial inspections should be communicated to the regulator and the fishing industry.
 - The cable burial risk assessment should comprise an assessment of cable exposure risk as well as risk to other marine users. It should be reappraised at appropriate intervals during the operational phase of the project.
 - The cable burial risk assessment should be linked to an appropriate cables survey/monitoring regime.
 - Burial status results from monitoring should be communicated to the fishing industry.
 - Exposed cables should be protected by guard vessel or other equivalent at-site warning systems until appropriate remedial measures can be completed.
 - Post remediation surveys should be undertaken and communicated to the fishing industry to provide best assurance post works that no residual snagging risks remain.

42. VisNed/the NFFO note and welcome provision with the DCO/ Deemed Marine Licence (DML) for reporting of dropped objects and exposure of cables. In the case of exposure of cables VisNed/the NFFO suggest that this should also refer to shallow buried cables as presently proposed by FLOWW - draft Recommendations for Fisheries-Cable Interactions, Planning and Mitigation, And Guidance on The Offshore Transmission Owners (OFTOs) Regime.

43. VisNed/the NFFO suggest the following amendment (in red) to Schedule 9 Part 4, Section 9 (12) Notifications and inspections and Schedule 10, Part 4, Section 9 (12):

(12) In case of *a state of shallow burial or* exposure of cables on or above the seabed, the undertaker must within five days following the receipt by the undertaker of the final survey report from the periodic burial survey, notify mariners by issuing a notice to mariners and by informing Kingfisher Information Service of the location and extent of exposure. Copies of all notices must be provided to the Marine Management Organisation (MMO and Maritime and Coastguard Agency (MCA) within five days.

Applicant's Position

44. The Applicant considers that that the DML conditions and the provision made in the Outline FLCP (Document reference 8.19, APP-710) are appropriate to minimise potential snagging risk.

45. Measures proposed by the Applicant (and secured through consent conditions) which are of relevance with regards to minimising potential for snagging risks are outlined below:

- The Scour Protection and Cable Protection Plan required under the draft DCO Schedules 9 and 10 (Part 4 Condition 14(1)(e)) of the Generation Assets Deemed Marine Licences (DMLs), Schedules 11 and 12 (Part 4 Condition 9(1)(e)) of the Transmission DMLs and Schedule 13 of the Interconnector assets DML (Part 4 Condition 7(1)(e)) in accordance with the Outline Scour Protection and Cable Protection Plan (Document reference 8.16, APP -707), must be approved by the MMO prior to construction. This document will be updated as the final design of the project develops and will include justification of the location, type, volume and area of cable protection, based on crossing agreements and pre-construction survey data to ensure only essential cable protection can be installed.
- Condition 14(1)(e) of Schedule 9 and 10, Condition 9(1)(e) of Schedule 11 and 12 and Condition 7(1)(e) of Schedule 13 require that prior to commencement of licensed activities "...details of the need, type, sources, quantity and installation

methods for scour protection and cable (including fibre optic cable) protection..."
must be approved by the MMO.

- Production of the Cable Specification, Installation, and Monitoring Plan (to be agreed with the MMO pursuant to Condition 14(1)(g) (Schedules 9 and 10), Condition 9 (1) (g) (Schedules 11 and 12) and Condition 7(1)(f) (Schedule 13) must include: (ii) a detailed cable (including fibre optic cable) laying plan for the Order limits, incorporating a burial risk assessment to ascertain suitable burial depths and cable laying techniques, including cable landfall and cable protection measures; (iii) proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised scheme which includes a risk based approach to the management of unburied or shallow buried cable.
- Dropped objects will be reported to the MMO using the Dropped Object Procedures Form outlined in Schedules 9 and 10, Part 4, Condition 12 (10), and Schedules 11 and 12, Part 4, Condition 7 (11) and Schedule 13, Part 4, Condition 5 (10).

46. Co-existence procedures noted in the Outline FLCP of relevance in the context of minimising snagging risk include:

- Regular and routine communications with the fishing industry;
- Early provision of construction and cable laying plans, including location and methods for cable protection, if required;
- Consideration for the use of guard vessels;
- Development of a fisheries guidance document to reduce interactions with fishing activity and provide response procedures;
- Cable burial monitoring;
- Provision of procedures for the safe recovery of lost or snagged fishing gear; and
- Appropriate communication with the fishing industry in the event that cables become unburied during the operational phase (i.e. through the Fisheries Liaison Officer (FLO) and appropriate channels such as the Kingfisher Information Service). This has been reflected in the draft DCO under Schedule 9 and 10, Part 4, condition 9 (12) and Schedule 11 -12, Part 4 condition 4 (12). The Applicant considers that the wording included in the draft DCO is appropriate.

2.2.4.2 Funding Arrangements

[VisNed's/the NFFO's Position](#)

47. VisNed/the NFFO encourage the use of funding arrangements like the West of Morecambe Fisheries Fund as a mechanism to support fishing industry stakeholders affected by the project and to provide work opportunities (e.g. guard vessels or surveys for example) to affected fisheries stakeholders as far as practically possible.

48. VisNed/ the NFFO encourages adoption of the Fish Safe device by fishing vessels operating in wind farm areas – see <http://www.fishsafe.eu/en/fishsafe-unit.aspx>. VisNed/ the NFFO consider that this technology, when combined with other safety elements referred to above under VisNed’s/the NFFO’s position in relation to snagging risks, provides automated means of integrating safety information into the navigational systems on fishing vessels that in turn provide a real-time warning of safety hazards in the wheel house. VisNed/ the NFFO consider that this would promote safe working regimes in the vicinity of the project and minimise the likelihood of incidents occurring in areas with high levels of fishing activity.
49. VisNed/ the NFFO consider that funding arrangements address residual impacts and are therefore relevant to the DCO consenting regime. VisNed/ the NFFO also consider that the fish safe device (or similar) is a measure for mitigating seabed snagging risks and therefore VisNed/the NFFO consider it relevant to the DCO consenting regime.

Applicant’s Position

50. The potential for a community benefit fund is outwith the DCO consenting regime and therefore wider community benefits should not be taken into account when determining the Application. Notwithstanding this, the Applicant has and will continue to engage in relevant wider industry initiatives as appropriate.

The names inserted below are to confirm that these are the current positions of the parties contributing to this SOCG

Printed Name	Dale Rodmell
Position	Assistant Chief Executive
On behalf of	National Federation of Fishermen's Organisations (NFFO)
Date	03/03/2020

Printed Name	David Ras
Position	Policy Officer
On behalf of	VisNed
Date	03/03/2020

Printed Name	Jake Laws
Position	Norfolk Boreas Consents Manager
On behalf of	Norfolk Boreas Limited (the Applicant)
Date	03/03/2020