

The Hornsea Four development encroaches on long-established static and mobile gear fisheries and some degree of adverse impact on fishing businesses is inevitable. The potting fishery for crab and lobster is likely both to be the most impacted and least able to adapt. Potting grounds are established because of the presence of resident populations of commercially valuable species in those locations. Potters cannot simply move their gear and fish somewhere new: were there anything to catch elsewhere, someone would already be catching it.

The Environmental Statement acknowledges that potters will lose valuable access to their established grounds during construction and we applaud the developer's commitment to compensate for the economic damage that cannot be obviated, in line with established best practice.

We note and echo the developer's desire to see the coexistence of fishing fleets and operational wind farms. While such coexistence is very much to be hoped for, we do not think that it is sensible to assume that it will be achieved. There are instances of successful co-location of fishing and wind farms elsewhere - the nearby Westernmost Rough OWF is one example – but conditions in those sites cannot be equated automatically with Hornsea Four site. Hornsea Four is much further offshore and much more exposed to wave and weather than Westernmost Rough, for example. To make distant trips economically viable, potting boats must deploy longer strings of pots, which require more room: making the inter-turbine distances crucial. If these prove insufficient, then fishing operations may no longer be possible within the site. The de facto exclusion of fishing activity from all, or a significant part, of the site is a realistic worst case scenario which will only be prevented through good communication and the design and operation of the wind farm with coexistence in mind. We do not agree, therefore, with the characterisation of this risk as minor (ES section 6.11.2.15).

Proper cable burial will be crucial to the safe resumption of fishing both within the array and along the cable route. There should be regular monitoring and a procedure agreed for rapidly informing the fishing fleet of any deburial incidents.

The cumulative effects of other developments in the region on the fishing industry are substantial. We are pleased to see the inclusion of MCZs in the Environmental Statement's consideration of cumulative effects, but cannot agree with the characterisation of their likely impact on static gear fisheries as 'minor' (Chapter 6, section 6.12.2.18). Some groups have campaigned to preclude all bottom contacting fishing gear from MCZs around the UK and we consider that this remains a very significant risk to commercial fishing with pots. This is factor that should be taken into account when considering the cumulative impact of the various claims that are now being made to traditional fishing grounds.

With any major construction project such as this, there should be ongoing monitoring of the health of the impacted ecosystems. We are concerned, however, that the data used in compiling this report do not represent an adequate ecological baseline to allow this. Table 6.6 shows that site specific survey data used in the analysis is both outdated (collected in 2010, 11, and 12) and was collected using methods that are inappropriate to accurately characterise the key commercial species present in the site. Beam and otter trawls do not catch crabs and lobsters, so it is unsurprising that those species were hardly encountered in the environmental surveys cited, while simultaneously supporting a prolific and valuable commercial fishery.

There is an acknowledged lack of accurate detail in the Environmental Statement on fishing activity carried out by the local potting fleet. The large majority (>90%) of local potting vessels are under 15m overall length and thus are not apparent from VMS data. Sporadic observer data is

never adequate to accurately capture the extent of a fishery, where the presence and absence of fishing boats changes from day to day with weather and tides and varies across the year with seasonal changes in target species behaviour. Good communication with local fishermen's organisations will be able to produce accurate and current information about the location and extent of fishing activity.