

From: Dale Rodmell [REDACTED]
Sent: 28 May 2019 16:34
To: Thanet Extension <ThanetExtension@planninginspectorate.gov.uk>
Subject: Thanet Extension ExQ3

Good afternoon,

Please find below a representation made to the MMO regarding noise mitigation for herring and sole spawning grounds, which I am forwarding for consideration in response to deadline 6: third written questions and request for information (ExQ3 3.1.5).

Kind regards,

Dale

Dale Rodmell
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From: Dale Rodmell
Sent: 16 May 2019 15:33
To: Suleiman, Adam <[REDACTED]>
Subject: Thanet extension - impacts on commercial fisheries

Dear Adam,

We have given consideration to the information on assessed impacts of pile driving on spawning sole and herring for the above PINS application and offer the following.

It is our understanding that a standard mitigation approach to minimising the impacts on spawning fish populations from pile driving operations is to apply seasonal restrictions. This is understood to have applied to the original Thanet windfarm licence. In light of this, we see no clear scientific justification why similar mitigation measures should not be applied to in this case.

Additional modelling has been provided in response to queries raised at deadline 4 which aims to set the scale of impact within the wider context of the spawning populations in temporal and spatial terms. This does not appear to take into account the potential for behaviour responses or masking effects that may impact sole and herring during spawning; in fact the applicant considers a fleeing response to be positive, but that may not be the case. It is not known what effects a fleeing or other behavioural responses would have on spawning potential at a critical life stage. Would a fleeing population spawn at all?

The assessment conclusions with respect to masking and behavioural effects are also reliant upon expert judgement (Popper et al. 2014) rather than empirical evidence.

In light of the above, as well as the absence of knowledge and data on particle motion effects (as opposed to pressure wave) on fish populations, which pile driving can transmit through the seabed and into the water column, this suggests that applied mitigation should err on the side of precaution.

We note that regionally, the fishing industry is witnessing a significant downturn in sole abundance and therefore it is important that potential impacts to this stock are appropriately managed.

We also observe that applying seasonal restrictions provides an approach that enables development to coexist with the spawning populations, whereas the alternative is to accept a level of impact is likely to occur.

For these reasons we believe time-bound restrictions on pile driving during the spawning seasons for both herring and sole are a necessary licence condition.

Kind regards,

Dale

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