

**From:** [REDACTED]  
**Sent:** 22 April 2025 08:55  
**To:** North Falls  
**Subject:** Further submission as requested at specific meeting 9th April ref 20050478 please acknowledge receipt

Hi

I was requested to make further comments on why the SOCG hadn't been agreed and signed and on the draft FCLP.

We previously requested that the following in some form was included in the document but the applicant failed to respond.

**CFWG does not believe the EIA represents the type of vessel, and indeed business, represented by the Commercial Fishermens' Working Group (CFWG).**

Therefore, at present mutual agreement on the impact conclusions on the CFWG vessels is not possible.

As the above SSE/RWE have not accepted that all fishing methods may be impacted and the wording significant should be removed. Any mitigation methodology should allow all fishers to present evidence of loss, in line with FLOWW guidance. RWE/SSE we believe have a set policy that excluded mobile gear fishing methods and any relaxation will have implication on other projects. We have continually asked their reps to confirm if this is a set policy and they have refused to answer!

Also the applicant has continually refused to accept that all our vessels operate multi method of fishing and therefore all may be impacted by the development.

FLCP

The CFWG has not had enough time to assess the draft document and will require further time to discuss the document which has been submitted as part of the process.

Points of concern

1 introduction

1 it states that the applicant is "highly experienced developers" having been involved in off shore projects for 15yrs I am not aware of either being involved within the Thames Estuary so I question their quote.

1.2

7 positive approach.

as previously stated RWE/SSE set policies has brought into question that comment.

12 learnings from previous period of offshore activities.

We have consistently referred to our previous experiences with other developers projects within the Thames estuary where to date, there has been no conflict and the applicant has failed to refer to that fact so we question that statement.

1.4

14 information gathering,

The attempt to gather information with individual fishers operating within the array site or the inshore area has not taken place and the only information the applicant has received or requested was to issue a chart and ask reps to indicate where fishing was undertaken. On these charts the whole cable route was completely covered which indicated the whole areas importance to the inshore fleet. No attempt was made to establish the possible financial loss if fishing activities were disrupted during surveys, construction and length of the project.

2

21 RWE is a partner or owner

We have no previous experience on these projects with RWE.

28 Consultation and engagement

I question this statement as meaningful attempt to gain evidence has not been undertaken.

3

36 the fishing community will as always strive to work together with any developers and has vast experience on good practice, but that has only been achieved by having meaningful discussion on a regularly basis with both sides accepting the importance of any loss to fishers activities and the possible significant impact on their financial viability. RWE first attempt when challenged by a 2 fishers who only wanted to carry on with his usual activities was “ if you get in our way we will facilitate a legal injunction against you” their stance is by policy that some fishing methods are not impacted and therefore they have priority, which historically their guard boats have aggressively enforce.

The other issue not considered is that their operation significantly disperse fish from the area and it takes sometimes weeks to return if ever. All other developers have accepted this fact and included for consideration mitigation. If one was a fish and had a large cable laying vessel ploughing up your home I’m sensing one would get as far away as possible!

4.1

40 The applicant has implied they will only require a 500m safety zone, we have requested that guarantee for all surveys and construction vessels skippers and it be included in both SOCG and FLCP which they have resisted. From our experience the 500m has never been achieved on any other project and total exclusion zones have had to be introduced to allow the developers unrestricted access with no possibility on conflict with fishers.

East Anglian 1 total exclusion zone

East Anglian 3 total exclusion zone

East Anglian 1 North total exclusion zone

East Anglian 2 total exclusion zone

All initially suggested that would not be require exclusion however soon realised the possibility of disruption to their operation was too high.

Table 4.1

Cable burial minimum of 0.5m the Thames Estuary is renown for the mobility of the sea bed and on other projects during this process we have stated “your cables wont stay buried” this is the case on numerous other existing projects were exposed cables have created hazards to fishing. Yes we’ll be informed but they will create no go areas for fishers.

Rock Placement.

Any rocking will creat snags for certain types of fishing and will have to be avoided for safety of vessels and crew.

Cable Exposures

Some existing cables have been exposed for years and because of the shifting seabed and uncertainty of the continued exposure have been left as exposed.

Post lay and cable burial inspections.

The issue we have is there is no bench mark of the seabed pre and post construction so to establish if the sea bed has been restored to is original condition and fishable after construction and cable laying. Other developers have accepted this as a possible issue for fishers and agreed to under take pre and post construction fishing surveys along the cable route to ensure that fishing activities can carry on safely. The applicant have declined to this undertaking putting totally the responsibility on individual skippers to establish its safe to fish, which is totally unacceptable.

They have stated they will use best practise however having been involved in numerous other off shore projects which have been successful for both the developers and fishers and have quoted that to the SSE.

Where have they found what they believe to be best practise as the haven't had a previous project in the shallow Thames estuary. Approximately 65 vessels all under 10m, mostly singled handed or 1 crew, multi fishing methods, mainly targeting only 4 species, restricted travel distance. Because of the numerous ongoing and existing off shore projects the fishers are being squeezed into a ever decreasing circle where soon fishing will become unsustainable and financially unviable. That is why if approval is given all these issues above must be addressed, and we request until they are, that approval is withheld.

Regards

[REDACTED]

Secretary

Harwich Harbour Fishermens Association

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