

Date: 10/03/2026

Our Ref: 2026_2_25-679

Dear Examining Authority,

Response to the Examining Authority's second written questions (ExQ2)

1.1 Role of Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA)

The role of Eastern IFCA is "to lead, champion and manage a sustainable marine environment and inshore fisheries" in the context of our main duties¹ within our district, which extends from the Humber to Harwich, and six nautical miles out to sea. To achieve this, Eastern IFCA gathers and analyses fisheries and environmental information, including through dialogue with our stakeholders, catch returns and research, to inform management decisions.

The proposal has the potential to impact fishing opportunities within the Eastern IFCA district. Eastern IFCA may have expertise relevant to the proposal and an interest in the application and it is therefore considered appropriate for Eastern IFCA to provide comment on the application.

1.2 Eastern IFCA's role in responding to consultations

Eastern IFCA reviews application documentation and will seek to advise on potential interactions between fishing activity and the environment, the potential implications of these interactions and the effectiveness of mitigation proposed within the application as appropriate. We will also seek to identify, where possible, relevant stakeholders who may be impacted by the application.

2. Eastern IFCA's Response

Eastern IFCA's response is presented in the subsections below.

2.1 Response to question 2CF4 - Provide comments on the updated version of ES Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009] and ES Appendix Commercial Fisheries Technical Report [REP1-007] and the applicant's responses to selected representations in [REP2-022] table 6.14.

The question asked for comment on the following:

- *Adequacy of baseline data gathering and forecast methods*

The data gathered for baseline fishing activity appears adequate, including both available landings/activity data (MMO, VMS, AIS, IFCA) and direct consultation with fishermen from a variety of fishing associations. This consultation likely

¹ S.153 & 154 of the Marine and Coastal Access Act 2009 (c.23).

helps to compensate for the lack of representation of under 10m vessels in much of the available data. Whilst the data are primarily presented at a larger scale (e.g. ICES rectangle or the applicants study area), there are no clear inconsistencies with what we know to be occurring in the relevant portion of the Eastern IFCA district. Furthermore, the applicants consultation with fishermen was able to identify finer scale areas for specific gear types.

The forecast methods used rely on the current and recent fishing trends, assuming they would continue to follow these trends in the absence of development. This is a reasonable approach, and potential influential factors such as Brexit and COVID-19 have been taken into account. A dynamic approach is advised to consider significant changes to fishing activity during the assessment process and throughout the projects various phases.

- *Adequacy of assessment of potential effects*

The potential impacts scoped into the assessment cover the key concerns raised in our previous written representation. These appear to have been assessed adequately with consideration to local fishermen and different gear/methods. It is agreed that, with the embedded measures and mitigation, significant effect to fisheries are likely to be minor. It should be noted that some individual fishermen are more likely to be impacted based on their location, vessel size, fishing grounds and financial/practical resilience to these impacts. Whilst this has been touched on in the Environmental Statement, the importance of individual fishermen should be emphasized as well as the fisheries as a whole.

- *Adequacy of proposed mitigation and compensation methods*

The embedded measures and mitigation are in line with what was requested in our written representation, including procedures to minimise impacts to fishing activity and gear, and appropriate measures to ensure active and continuous communication with fishermen and other sea users. Included in the list of mitigation measures is the development of procedure for loss of/damage to fishing gear, it is important that this is developed in collaboration with stakeholders and Eastern IFCA request to continue to be consulted on this. The additional mitigation proposed to reduce the significance of impacts include development of a Fisheries Co-existence Liaison Plan, agreement of the detailed nature of compensation post-consent, methods for engaging with the fisheries sector on cable design and post-installment monitoring. Concerns in relation to compensatory measures were included in our written representation; indirect impacts of monetary payments to fishermen should be carefully considered. Aside from this, the measures proposed cover our key concerns and we have no further suggestions at this time.

2.2 Response to question 2CF5 - Provide comments on the oFCLP [REP4-081].

The outline FCLP provides a clear overview of the approach to engagement with fisheries stakeholders, including appointment of a Fisheries Liaison Officer and Offshore Fisheries Liaison Officer. It is clear what these officers will be responsible for. Understanding of the importance of effective communication with fishermen is evident.

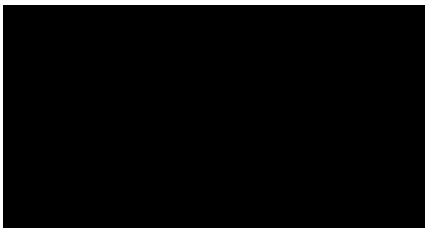
From this outline FCLP, the level of engagement proposed appears appropriate. As mentioned above, plans to develop compensation measures should be done with collaboration with the industry and with consideration of indirect effects.

2.3 Response to question 2CF7 - Consider whether the applicant's assessment of cumulative effects with other developments on commercial fisheries is adequate in table 11.24 [REP1A-011]. If you consider that it is not adequate, explain what additional information or assessment is required. Do you consider that additional mitigation is required, if so what mitigation measures are sought?

Reasonable considerations have been made to the cumulative effects with other developments. It is important that impacts of the increasing number of developments on fishermen is fully understood. For example, one section of the assessment mentions that there is potential for moderate significant effect if exclusion zones from different developments are implemented at the same time and in close proximity. It should also be considered that an increasing frequency and area of temporary losses to fishing grounds or disruptions may take a cumulative toll on fishermen even if they occur at different times/locations within an area. Communication and collaboration between developers with input from fishermen is important to mitigate cumulative effects as much as practicable.

Please do not hesitate to contact me should you have any queries on the above response.

Yours sincerely,



Marine Science Officer
Eastern Inshore Fisheries and Conservation Authority