

# **Net Gain**

## **Final Recommendations**

### **Annex 6:**

### **Stakeholder Feedback**

**Submission to Natural England & JNCC**

**31 August 2011**

**Net Gain  
The North Sea Marine Conservation Zones Project  
The Deep Business Centre  
Tower Street  
Hull, HU1 4BG**



**Copies of all formal feedback received from stakeholders by Net Gain following each Iteration Report and the Draft Final Recommendations Report.**



**Feedback on Broad Areas of Interest following first iteration of MCZ development**

Name Emily Kennard (Environmental Officer, EDF Energy) .....  
 Sector represented EDF Energy - Existing Nuclear (EN) energy generation (Sizewell 'B' and Hartlepool 'A' Nuclear Power Stations)

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
11, 1 and 10		X		<p>Communication and involvement with local/national stakeholders.</p> <p>Socio-economic impacts on businesses (including nuclear power generation) as well as environmental impacts to be assessed. This will further aid in a fair &amp; accurate decision-making process.</p> <p>An emphasis on obtaining all the relevant information from these stakeholders (either through direct contact or through the NCS process).</p>	<p>Some of our current activities include:</p> <ul style="list-style-type: none"> <li>• The use of seawater for operational plant cooling purposes. This is a nuclear safety issue &amp; is vital to operations.</li> <li>• Control of bio-fouling within the cooling water systems.</li> <li>• Marine maintenance activities (such as de-silting works by divers &amp;/or dredging, maintenance works on intake/outfalls)</li> <li>• Shoreline management to protect &amp; maintain our shore defences.</li> <li>• Environmental survey work (by boat, trawler or shoreline work)</li> </ul> <p>The impacts &amp; costs from further restricting any activity may be high. Depending on the proposed restrictions (if any) this may pose a significant risk to our operational activities. We are already operating under strict limits &amp; guidelines set by the Regulator &amp; any changes to this will be of great concern.</p>	<p>In order for EDF Energy to provide an accurate opinion of the BAI sites, NetGain should provide more comprehensive map coverage &amp; information as to why &amp; how these sites have been highlighted. Are there any other sites that are being considered?</p> <p>EDF Energy is in the process of completing a NetGain Sectoral Information form. This will be provided to the Group so that EDF Energy's operational activities &amp; interests (environmental/socio-economic) can be taken into account during the remainder of the decision-making process.</p> <p>Please also provide some further information explaining what restrictions are likely to be placed on activities within an MCZ designation. We cannot make an informed decision on the possible impacts without first understanding what is likely to change. How will activities that are already regulated through permits &amp; consents be affected by an MCZ designation? How will consent variations &amp; new permit applications be treated?</p>

Continued over

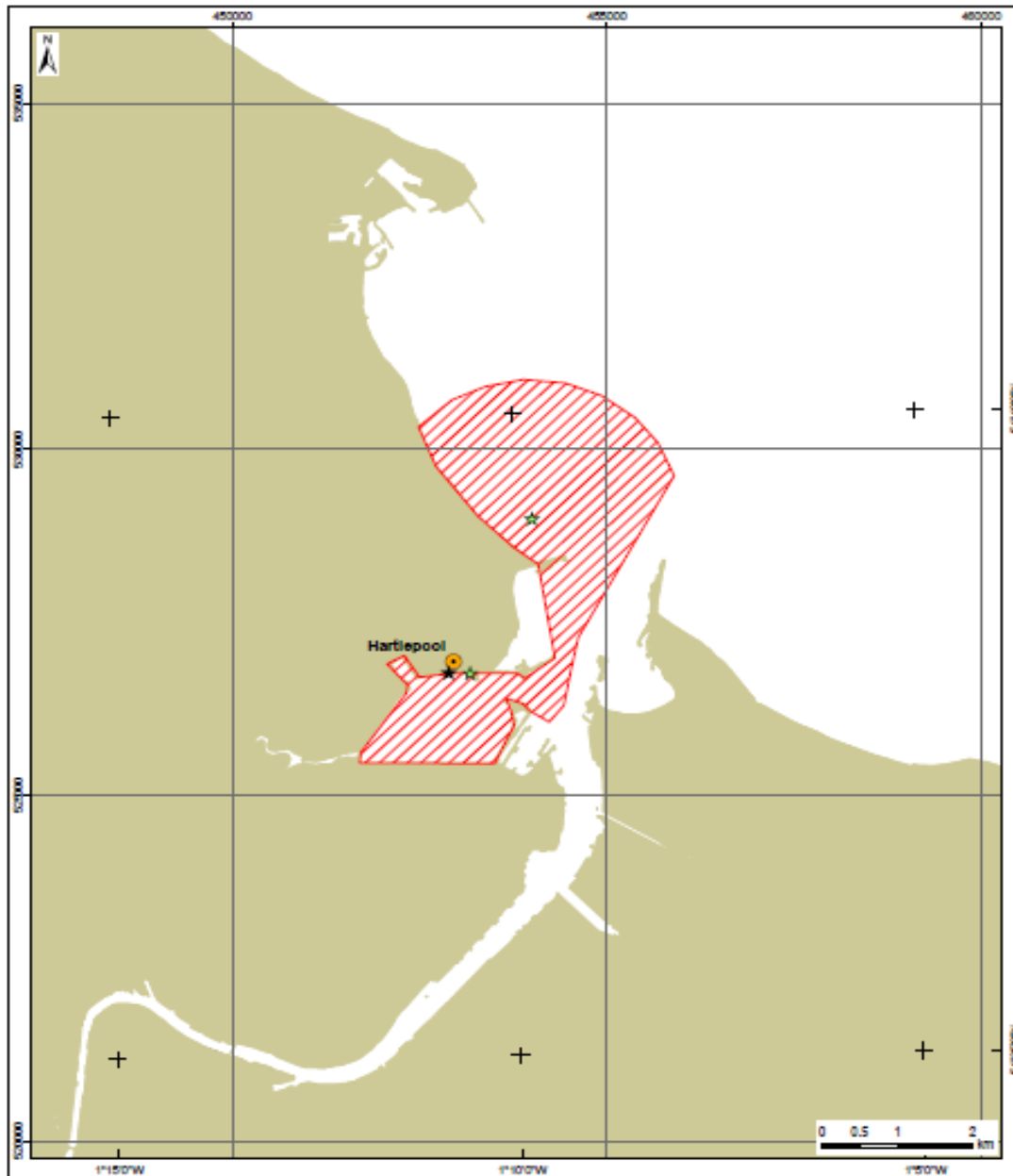


11, 1 and 10		X	<p>There is concern that there is a bias towards choosing areas that have enough data/information in order to justify an MCZ designation. These will naturally fall into areas that are already protected (e.g. SPA/SACs) or are situated close to industry (as environmental survey work often is carried out in these places). Where there is a lack of suitable habitat/scientific data it shouldn't be assumed that there is no conservational value to that particular area.</p>		<p>Please see the attached maps showing the 'Area of Influence' for marine activities surrounding both power stations. It should be noted that they outline the positions of the stations &amp; their intake/outfall structures in relation to the surrounding areas. These maps were produced by ABPmer on behalf of British Energy (EDF Energy). <b>They do not outline the environmental impacted areas, but rather the areas affected by the operational activities including those of all local industries &amp; sea users.</b> They have been included here to merely display the areas in which any changes to sea use by external stakeholders could potentially effect our operations &amp; how far into the surrounding areas our operational interests lie.</p>

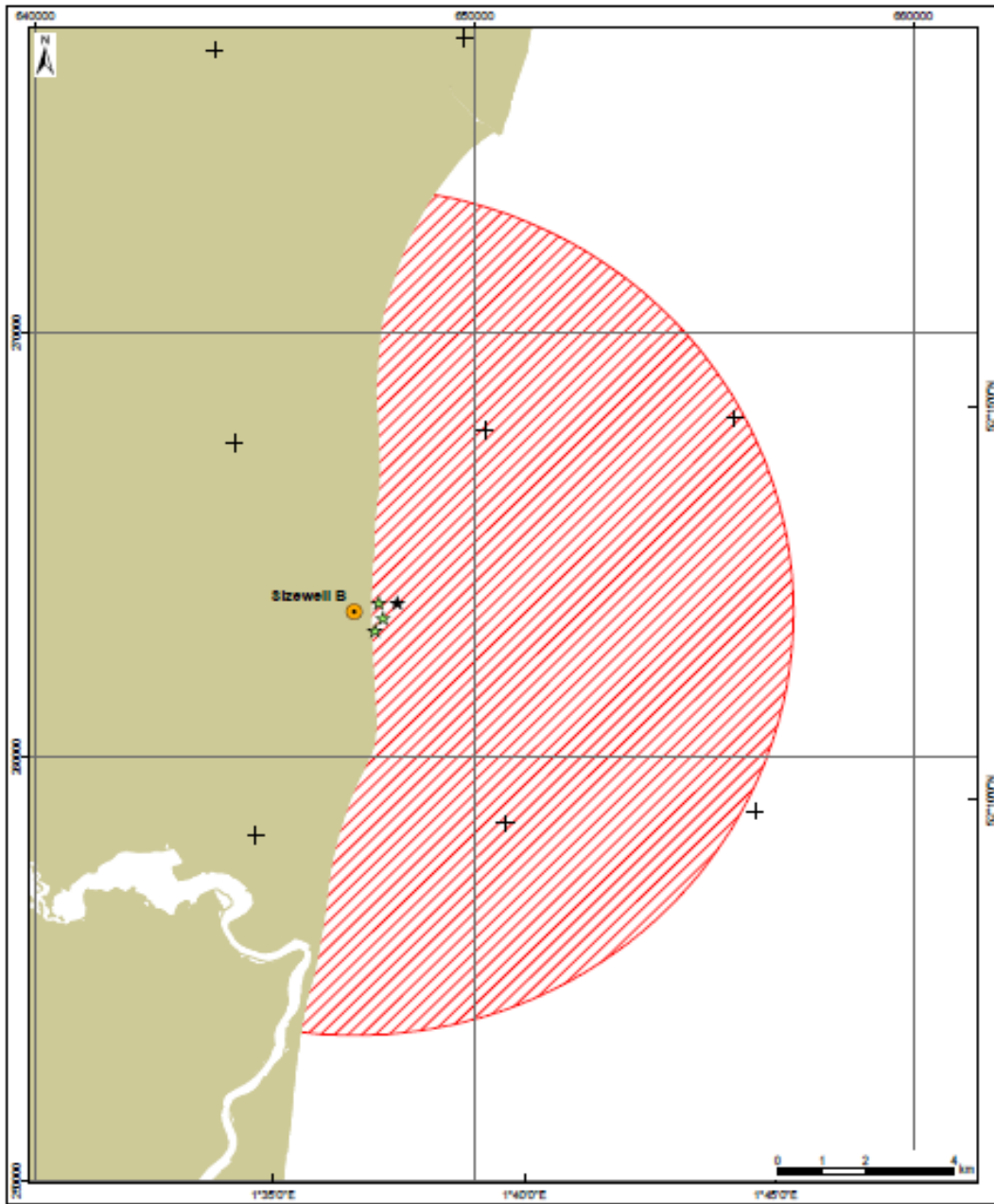
Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

or to:

Net Gain  
The Deep Business Centre  
Tower Street  
Hull HU1 4BG



	<b>Date</b>	<b>By</b>	<b>Size</b>	<b>Version</b>
	May 2008	DD	A4	1
	<b>Projection</b>	OSGB 1936		
	<b>Scale</b>	1:75,000		
	<b>QA</b>	DP		
3305 - Fig_Hartlepool_Zone.mxd				
Produced by ABPmer Ltd				
<small>© ABPmer. All rights reserved. 2008 SeaZone licence 03007 D16 (British Energy - CEFA3) NOT TO BE USED FOR NAVIGATION</small>				
			<b>Hartlepool Zone of Influence for Marine Activities and Notifications</b>	
				<b>Figure 1</b>



	Date	By	Site	Version	<ul style="list-style-type: none"> <li>☆ Outfall</li> <li>★ Intake</li> <li>● BE power station</li> <li>▨ Power station zones</li> </ul>
	May 2008	DD	AK	1	
	Projection	OSGB 1908			
	Scale	1:125,000			
	QA	DP			
3705 - Fig_Sizewell_Zone.mxd					
Produced by AEP/mer Ltd					
<small>© AEP/mer. All rights reserved, 2008.          Geotitles licence 032007 018 (British Energy - CEPAQ)          NOT TO BE USED FOR NAVIGATION</small>					



**Sizewell Zone of Influence for Marine Activities and Notifications**

**Figure 5**



**Feedback on Broad Areas of Interest following first iteration of MCZ development**

Name                      Emily Kennard (Environmental Officer, EDF Energy) .....

Sector represented      EDF Energy - Existing Nuclear (EN) energy generation (Sizewell 'B' and Hartlepool 'A' Nuclear Power Stations)

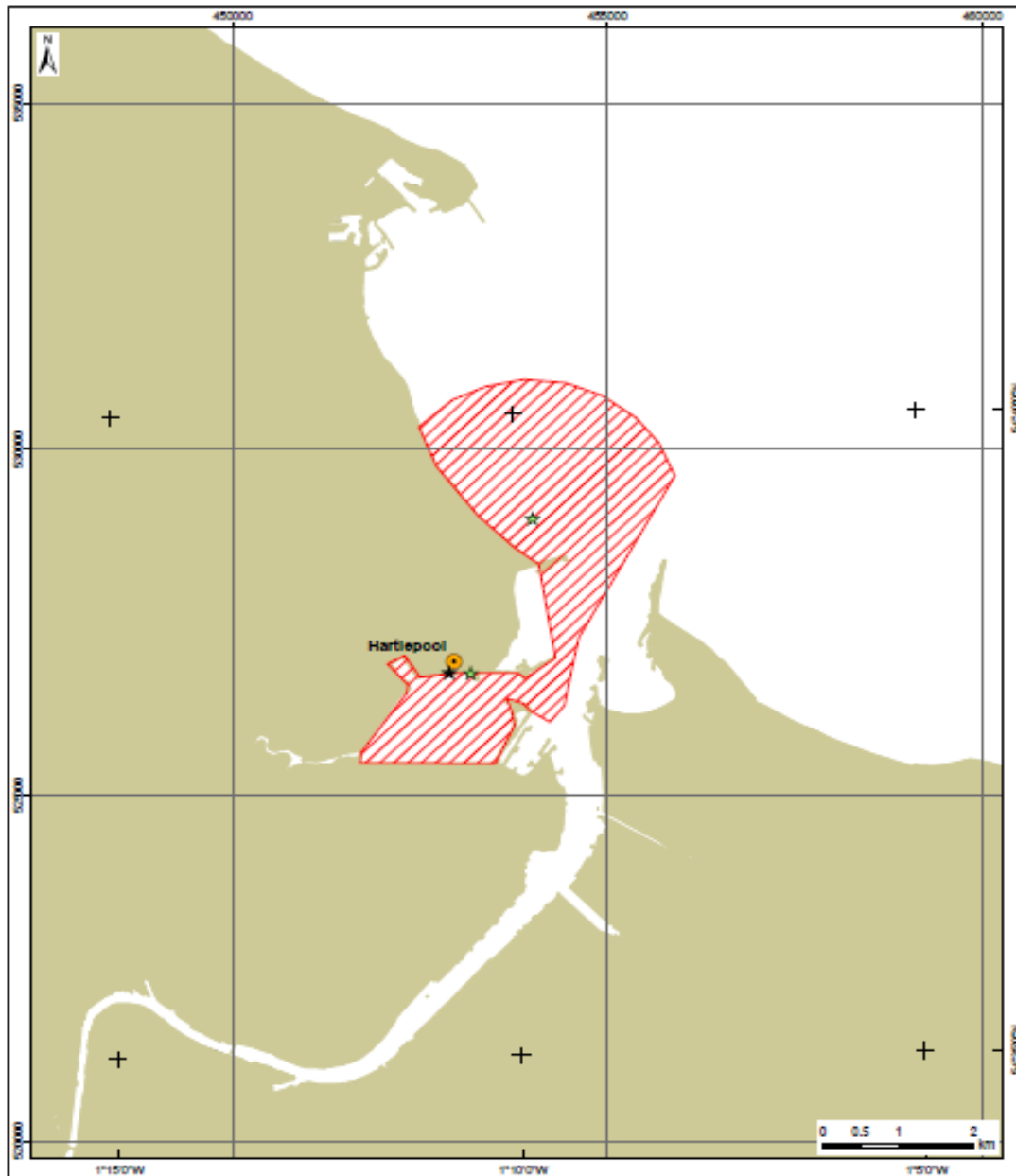
Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
11, 1, 10		X		<p>Communication and involvement with local/national stakeholders.</p> <p>Socio-economic impacts on businesses (including nuclear power generation) as well as environmental impacts to be assessed. This will further aid in a fair &amp; accurate decision-making process.</p> <p>An emphasis on obtaining all the relevant information from these stakeholders (either through direct contact or through the NCS process).</p>	<p>Some of our current activities include:</p> <ul style="list-style-type: none"> <li>• The use of seawater for operational plant cooling purposes. This is a nuclear safety issue &amp; is vital to operations.</li> <li>• Control of bio-fouling within the cooling water systems.</li> <li>• Marine maintenance activities (such as de-silting works by divers &amp;/or dredging, maintenance works on intake/outfalls)</li> <li>• Shoreline management to protect &amp; maintain our shore defences.</li> <li>• Environmental survey work (by boat, trawler or shoreline work)</li> </ul> <p>The impacts &amp; costs from further restricting any activity may be high. Depending on the proposed restrictions (if any) this may pose a significant risk to our operational activities. We are already operating under strict limits &amp; guidelines set by the Regulator &amp; any changes to this will be of great concern.</p>	<p>In order for EDF Energy to provide an accurate opinion of the BAI sites, NetGain should provide more comprehensive map coverage &amp; information as to why &amp; how these sites have been highlighted. Are there any other sites that are being considered?</p> <p>EDF Energy is in the process of completing a NetGain Sectoral Information form. This will be provided to the Group so that EDF Energy's operational activities &amp; interests (environmental/socio-economic) can be taken into account during the remainder of the decision-making process.</p> <p>Please also provide some further information explaining what restrictions are likely to be placed on activities within an MCZ designation. We cannot make an informed decision on the possible impacts without first understanding what is likely to change. How will activities that are already regulated through permits &amp; consents be affected by an MCZ designation? How will consent variations &amp; new permit applications be treated?</p>

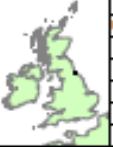

				<p>There is concern that there is a bias towards choosing areas that have enough data/information in order to justify an MCZ designation. These will naturally fall into areas that are already protected (e.g. SPA/SACs) or are situated close to industry (as environmental survey work often is carried out in these places). Where there is a lack of suitable habitat/scientific data it shouldn't be assumed that there is no conservational value to that particular area.</p>		<p>Please see the attached maps showing the 'Area of Influence' for marine activities surrounding both power stations. It should be noted that they outline the positions of the stations &amp; their intake/outfall structures in relation to the surrounding areas. These maps were produced by ABPmer on behalf of British Energy (EDF Energy). <b>They do not outline the environmental impacted areas, but rather the areas affected by the operational activities including those of all local industries &amp; sea users.</b> They have been included here to merely display the areas in which any changes to sea use by external stakeholders could potentially effect our operations &amp; how far into the surrounding areas our operational interests lie.</p>

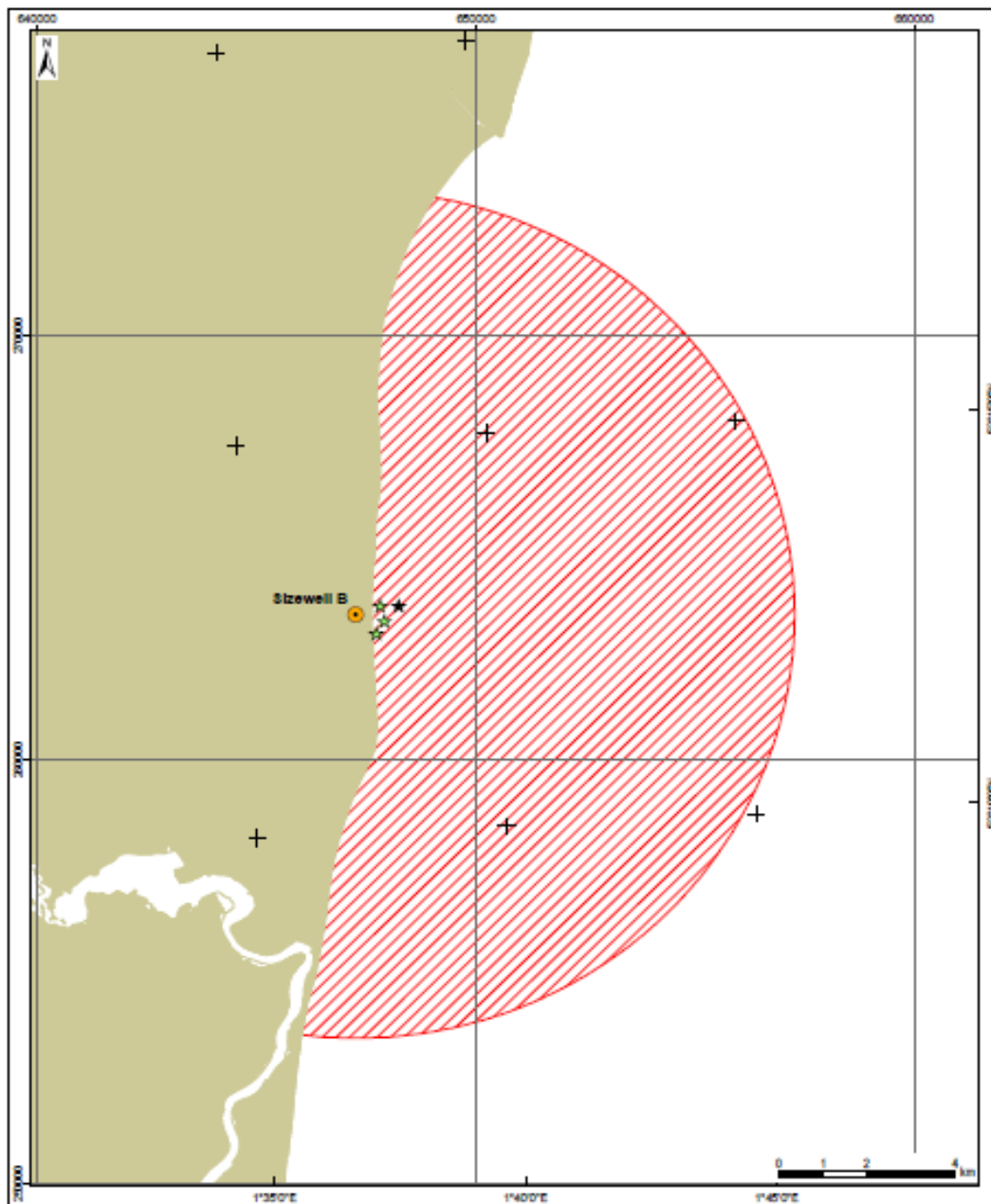
Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

or to:

Net Gain  
The Deep Business Centre  
Tower Street  
Hull HU1 4BG



	Date	By	Size	Version	<ul style="list-style-type: none"> <li>☆ Outfall</li> <li>★ Intake</li> <li>● BE power station</li> <li>▨ Power station zone</li> </ul>
	May 2008	DD	AA	1	
	Projection		OSGB 1936		
	Scale		1:75,000		
	QA		DP		
3705 - Fig_Hartlepool_Zone.mxd					
Produced by ABPmer Ltd					
<small>© ABPmer. All rights reserved. 2008 SeaZone license 032007 018 (British Energy - CEFAQ) NOT TO BE USED FOR NAVIGATION</small>					
			<b>Hartlepool Zone of Influence for Marine Activities and Notifications</b>		<b>Figure 1</b>



	Date	By	Size	Version	<ul style="list-style-type: none"> <li>☆ Outfall</li> <li>★ Intake</li> <li>● BE power station</li> <li>▨ Power station zones</li> </ul>
	May 2008	DD	A4	1	
	Projection	OSGB 1926			
	Scale	1:125,000			
	QA	DP			
3785-Fig_Sizewell_Zone.mxd					
Produced by ABBmer Ltd					
<small>© ABBmer. All rights reserved 2008 SeaZone licence 032007 019 (British Energy - CEPAQ) NOT TO BE USED FOR NAVIGATION</small>					



Sizewell Zone of Influence for Marine Activities and Notifications

Figure 5



**Feedback on Broad Areas of Interest following first iteration of MCZ development**

Name Madeline Hodge .....  
 Sector represented Nuclear Power, EDF Energy Nuclear New Build (NNB) Sizewell .....

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
1	x			<p>Communication and involvement with local/national stakeholders.</p> <p>Socio-economic impacts on businesses (including nuclear power generation) as well as environmental impacts to be assessed. This will further aid in a fair &amp; accurate decision-making process.</p> <p>An emphasis on obtaining all the relevant information from these stakeholders (either through direct contact or through the NCS process).</p> <p>There is concern that there is a bias towards choosing areas that have enough data/information in order to justify an MCZ designation. These will naturally fall into areas that are already protected (e.g. SPA/SACs) or are situated close to industry (as environmental survey work often is</p>	<p>We are currently in the process of producing the Stage 1 consultation material for the planning of Sizewell C Nuclear power station. Our activities in the area are likely to include:</p> <ul style="list-style-type: none"> <li>• The intake of seawater for cooling purposes, this water will then be discharged back to the sea.</li> <li>• Control of biofouling within the cooling water systems</li> <li>• Intake and outfall structures will be placed on the seabed in the vicinity of the station.</li> <li>• Marine maintenance work may need to be carried out around the intake/outfall structures such as dredging.</li> <li>• A temporary jetty will be constructed for the transport of heavy loads and aggregate materials.</li> <li>• Environmental survey work (by boat, trawler or shoreline work), some of which is currently taking place.</li> </ul>	<p>EDF Energy is in the process of completing a NetGain Sectoral Information form. This will be provided to the Group so that EDF Energy's new build activities &amp; interests (environmental/socio-economic) can be taken into account during the remainder of the decision-making process.</p> <p>To provide an accurate opinion on the BAI sites EDF Energy need more information on how these sites were selected and what socio-economic and environmental data were used to aid the decision making process.</p> <p>It would also be useful to know what restrictions would be put in place should an MCZ be located in the area. If there is a potential SPA in the same area as an MCZ what does this mean in terms of restrictions?</p> <p>How will applying for consents and permits for</p>



				<p>carried out in these places). Where there is a lack of suitable habitat/scientific data it shouldn't be assumed that there is no conservational value to that particular area and as such just because data is available for an area it does not mean a designation should be assigned to that area.</p>	<ul style="list-style-type: none"> <li>• Construction and maintenance of coastal defences.</li> </ul> <p>Depending on the proposed restrictions (if any) this may pose a risk to receiving consent for the discharge of cooling water and the placement of structures on the seabed. We will be applying to regulators to receive consent for these activities however any restrictions may be harmful from a Nuclear Safety perspective.</p>	<p>the listed activities be affected by an MCZ? It's difficult to make a decision on location without knowing which activities will be restricted and how.</p>
--	--	--	--	---	---	--

Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

or to:

Net Gain  
The Deep Business Centre  
Tower Street  
Hull HU1 4BG





**Feedback following first iteration of MCZ development**

Name Gillian Sutherland /Helen Thompson .....  
Sector represented Renewable Energy .....  
Regional Hub East of England .....

**Please explain briefly how the feedback you are presenting was collected and an indication of how many people you have been able to discuss this with.**

*Renewables UK sub group on MCZ's was consulted, requesting any developers to feedback on any concerns with 1<sup>st</sup> iteration. No individual developers (other than my own as a representative of the Round 3 East Anglia Zone) responded however RUK have a position paper which has been used to ensure representation for the wider industry. The members of UKBCSE's marine working group were offered the opportunity to comment also, but no feedback was received by the deadline for responses for this iteration. The response is shared with The Crown Estate and Renewables UK.*

**For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?**

*It would be helpful if all the documents were available from the ftp site to send onto those interested rather than having to email very large files. Supply of GIS files would also greatly assist a speedy response in understanding interactions. I also had to request authorisation to distribute the information further as the request for sector representation conflicts with the request to keep this information confidential and not share? Needs to be clarified and is a wider MCZ issue being raised with DEFRA I believe. The Crown Estate , Renewables UK and UKBCSE have separate workstreams looking at how we ensure the industry is represented and we need to ensure these are brought together to prevent duplication for the regional hubs/ STAP members.*

*It would be helpful if the maps showing the Site ID was clearer, it is somewhat confused by the number of maps. I have used the table references in this response. The only map showing the Broad Scale Areas of Interest (in the Summary report) has incomplete numbering so therefore could not used as Site ID reference.*

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
All listed				No overlap	All socioeconomic. Restricted development opportunity (Offshore windfarm) or programme delays, failure to meet government renewable energy and climate change emissions targets.	A precautionary approach must be adopted as potentially negative development impacts of some management measures mean that the possibility of co-location cannot be considered until further discussion on potential management measures takes place. It is impossible to determine whether co-location is feasible until further detail about management measures, potential restrictions on activity and increases to survey/monitoring costs are scoped.
EE4_E					Within Round 3 East Anglia Zone.	
EE4_F					Within Round 3 East Anglia Zone.	
EE4_G					Within Round 3 East Anglia Zone.	
EE1_D12				Potential for 'management measures' to be adopted to allow co-location would need to allow construction and maintenance activities.	Within Round 3 East Anglia Zone.	
EE1_D14					Within Round 3 East Anglia Zone.	
EE1_D4					Within Round 3 East Anglia Zone.	
EE1_B					Within Round 3 East Anglia Zone.	
EE1_D8					Within Round 3 East Anglia Zone.	
EE1_D10					Within Round 3 East Anglia Zone.	
EE1_D1_2					Within Round 3 East Anglia Zone.	
EE1_D3					Within Round 3 East Anglia Zone.	
EE3_7C				Potential for 'management measures' to be adopted to allow co-location would need to allow construction and maintenance activities.	Within Round 3 East Anglia Zone.	
EE3_7A					Within Round 3 East Anglia Zone.	
EE3_7B					OVERLAP WITH R3 AND GALLOPER	
EE3_7C					Within a Round 3 East Anglia Zone.	
EE3_5B					Within a Round 3 East Anglia Zone.	
EE1_C2					Overlap with Galloper/Greater Gabbard	
EE1_C1					Overlap with Galloper/Greater Gabbard	

EE2_K	x			Potential for 'management measures' to be adopted to allow co-location would need to allow construction and maintenance activities.	Overlap with Galloper/Greater/Inner Gabbard	A precautionary approach must be adopted as potentially negative development impacts of some management measures mean that the possibility of co-location cannot be considered until further discussion on potential management measures takes place. It is impossible to determine whether co-location is feasible until further detail about management measures, potential restrictions on activity and increases to survey/monitoring costs are scoped.
EE2_G					Overlap with Galloper/Greater Gabbard	
EE3_6A					Overlap with Galloper/Greater Gabbard	
EE3_6B				Potential for 'management measures' to be adopted to allow co-location would need to allow construction and maintenance activities.	Overlap with Galloper/Greater Gabbard	
EE4_8					Overlap with Galloper/Greater Gabbard	
EE 2_F		X			Within a Round 3 East Anglia Zone.	As this is a small area and there are not many options for this habitat type we would consider avoidance or co-existence from this small area.
EE 2_L		X			Within a Round 3 East Anglia Zone.	This is aligned with the pSAC boundary , we would avoid this area for OWF development although potential need for cables near or within.
EE 2_M		x		BOUNDARY COULD BE ADJUSTED TO PREVENT OVERLAP	Within a Round 3 East Anglia Zone.	Potentially outwith the Round 3 zone, unlikely to have much integration other than vessel traffic during construction and ops.

General	X			Map all the various Crown Estate licensing rounds for both offshore wind and wave and tidal and avoid overlap (need to include R2.5)	Restricted development opportunity or programme delays, reduced ability to meet renewables targets	<p><b>Cables and cabling</b> – Although much of the focus will be on the wind farm itself, a turbine must also be connected to the grid via undersea cables and these may interact with potential MCZs. Cost implications, choice of cable routes and the need for flexibility in the consenting process for cables needs to be considered. It is impossible to project cable routing at this stage for projects within a zone.</p> <p><b>Socio Economics</b> – The UK offshore renewable energy industry could provide a total of 342,000 jobs and projected annual revenue of £164B in 2050. However, critical to ensuring these benefits is developing a vibrant UK manufacturing industry which is dependent on a marine planning policy that allows offshore renewables to be built in a timely and economic manner. In the past 6 months the UK offshore wind industry has created a total of 2,350 jobs and more will follow if confidence in the sector, including the consenting process, is maintained.</p>
---------	---	--	--	--	--	---

Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre

Tower Street

Hull HU1 4BG



## Feedback on Broad Areas of Interest following first iteration of MCZ development

**Name:** The Crown Estate  
**Sector represented:** All Crown Estate socio economic activity areas relating to Netgain MCZ

Site ID	Opinion of potential sites			Activities ongoing or planned by The Crown Estate in each BAI	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted
	Negative	Neutral	Positive			
1	X			<ul style="list-style-type: none"> <li>• BAI 1 overlays several active cables connecting the UK with Europe</li> <li>• BAI 1 overlays several inactive cables</li> <li>• Outer offshore border of BAI 1 lies adjacent to Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>• Further cable deployment may be required in BAI 1 to connect Zone 5 to National Grid</li> <li>• BAI 1 overlays cable connecting Greater Gabbard Round 2 Offshore Wind Farm to National Grid</li> <li>• Outer offshore border of BAI lies adjacent to a corner of a licensed aggregate production site and borders two separate aggregate areas with exclusivity agreements prior to future consent</li> <li>• Waste water outfalls and intakes at Lowestoft and Southwold</li> <li>• Wildfowling licenses in coastal area</li> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> </ul>	<p>The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified</p>	<p><b><u>Wind Farm Round 3</u></b></p> <p>The investment in Round 3 Wind farms is projected to be in the order of £100billion from generation assets and the supply chain</p> <p><b><i>Socio Economic Impact in the case of Restriction</i></b></p> <p>The UK Government will fail to meet obligated EU 2020 Climate Change targets resulting considerable EU fines and continued reliability on fossil fuel. Restriction of offshore wind deployment would result in the potential loss of the majority of the UK's target renewable energy production.</p> <p>Significant loss of national local economy revenue e.g. Dogger Bank Zone 3 Wind Farm has the potential to generate a total value of power of billions of pounds a year, a significant benefit to the UK economy.</p> <p>Significant loss of national and local employment for construction and operation e.g. In the last 6</p>

2	X		<ul style="list-style-type: none"> <li>• BAI2 is in close proximity/located within Scroby Sands Round 1 Wind Farm (difficult to be exact without accurate GIS data)</li> <li>• BAI 1 overlays several active cables connecting Scroby Sands to the National Grid (difficult to be exact without accurate GIS data)</li> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>• Wildfowling licenses in coastal area</li> <li>• Waste water outfalls and intakes</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	<p>months alone, a total of 2350 jobs have been created at a time of recession by the offshore wind sector. By 2020 UK offshore wind could support 70,000 jobs.</p> <p>Loss of revenue for the UK Government through lack of consent licence for construction of wind farms. All revenue generated by The Crown Estate is provided to the UK Government for the benefit of the UK citizen. In 2009/10 The Crown Estate generated £46.6m from the Marine Estate.</p>
3	X		<ul style="list-style-type: none"> <li>• BAI 3 lies within Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>• BAI3 lies within an area where many kms of cables may be required to connect Zone 5 wind farm</li> <li>• Pipelines, active and non active cables are located within BAI3</li> </ul>	The Crown Estate strongly recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	Considerable delays due to possible redesign, relocation of project, additional survey requirements (up to 2 years) to consenting process resulting in UK Government potentially failing to meet EU 2020 Climate Change targets and possible fines and continued dependence on non-renewable energy
4	X		<ul style="list-style-type: none"> <li>• BAI 4 does not directly overlay any Crown Estate activity areas</li> <li>• BAI4 is adjacent to the outer offshore boundary of Lincs Round 2 offshore Wind Farm site</li> <li>• BAI4 bordered by a licensed aggregate site and another aggregate site with exclusivity agreements prior to future consent</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	<p>Considerable delays due to possible redesign, relocation of project, additional survey requirements (up to 2 years) to consenting process and loss of operational revenue for developer with impact on local/regional economy.</p> <p>Time delay in construction and subsequent operation (up to 2 years) resulting in loss of national and local employment with temporary supply chain reduction</p>
5		X	<ul style="list-style-type: none"> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>• Capital and maintenance dredging</li> <li>• Waste water outfalls</li> <li>• Water abstractions</li> <li>• Wildfowling licences</li> </ul>	The Crown Estate is supportive of BAI 5 unless Conservation Objectives and subsequent management measures restrict or impact future activities	Considerable financial cost to developer due to potential requirement for micro-siting to avoid newly designated features/protected areas, increase in environmental surveys required for EIA and AA, and additional cost of post-construction monitoring, e.g. increase in costs of millions of pounds to obtain consent
6		X	<ul style="list-style-type: none"> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>• Capital and maintenance dredging</li> <li>• Waste water outfalls</li> <li>• Water abstractions</li> <li>• Wildfowling licences</li> </ul>	The Crown Estate is supportive of BAI 6 unless Conservation Objectives and subsequent management measures restrict or impact future activities	Cables for offshore wind cost between £300,000-400,000 per km. If cables are required to be re-



7	X		<ul style="list-style-type: none"> <li>• BAI7 lies within Zone 4 Hornsea Round 3 Offshore Wind farm site.</li> <li>• There are active cables, pipelines and non-active cable located in BAI7</li> <li>• BAI7 lies within 3 separate aggregate sites with exclusivity agreements prior to future consent</li> </ul>	<p>The Crown Estate strongly recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified</p>	<p>routed around a feature additional cable is required resulting in considerable increases in costs and creates the need for additional geophysical and geotechnical surveys (Renewable UK 2010).</p> <p><b><u>Wind Farm Rounds 1 and 2</u></b></p> <p>There are several offshore wind farms within the Netgain area consented under Rounds 1 and 2 which are in various stages of development and some are in operation. There have also been extensions granted to some Round 1 and 2 sites which will be required to go through the same consenting process as Round 3.</p> <p>Extensions have been granted by The Crown Estate totalling 1.7GW to five UK Round 1 and 2 sites which will power 1.4 million UK homes: including Greater Gabbard in the Netgain MCZ</p> <p><i>Restrictions imposed by MCZ designations to Round 1 and 2 sites would cause considerable socio-economic impacts (for high level information see Round 3 above)</i></p>
8	X		<ul style="list-style-type: none"> <li>• BAI8 covers the nearshore corner of Zone 4 Hornsea Round 3 Offshore Wind farm site.</li> <li>• A large proportion of BAI8 lies within Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>• There are likely to be many of kms of new cables deployed in BAI8 to connect Zones 4 and 5 and Round 2 extensions to the National Grid</li> <li>• Round 1 Offshore Wind Farms are located on coastal limit of BAI8 (Inner Dowsing, Lynn and Scroby Sands)</li> <li>• Round 2 Offshore Wind Farms and extensions are located within BAI8 (Greater Gabbard, Galloper, Inner Gabbard, Sheringham Shoal, Docking Shoal, Race Bank, Dudgeon, Triton Knoal, Humber Gateway, Westermost Rough)</li> <li>• There are already many active cables, pipelines and non-active cable located in BAI8</li> <li>• Several licensed aggregate sites are located within BAI8</li> <li>• Several aggregate sites with exclusivity agreements prior to future consent are located within BAI8</li> <li>• Two potential Gas Storage areas are located within BAI8</li> <li>• Maintenance dredging at Great Yarmouth Port exists within BAI8</li> <li>• Waste water outfalls and intakes are located within BAI8</li> <li>• Wildfowling licences in coastal area</li> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> </ul>	<p>The Crown Estate strongly recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified</p>	<p><b><u>Aggregate Sites</u></b></p> <p>The Netgain MCZ contains some of UK's largest marine aggregates resource with the majority of material coming mainly from the eastern (BAI 8) and southern coasts of England.</p> <p>Restrictions to dredging activities would cause significant losses to the national and local economy not only in revenue but also local/regional jobs.</p> <p>Restrictions to dredging activities would also reduce the security of supply for coastal protection and cause possible increases in costs and reducing the amount of coast being protected. Similarly, the amount of supply available for construction and the export economy would be reduced causing loss of revenue and possible jobs.</p> <p>In 2005, the market values for the marine</p>

9		X	<ul style="list-style-type: none"> <li>Possible pipelines and active cables (difficult to be exact without accurate GIS data)</li> </ul>	The Crown Estate is supportive of BAI 9 unless Conservation Objectives and subsequent management measures restrict or impact future activities	<p>aggregate dredging industry included £80 million GVA from processing and £303 million GVA from sales of concrete products. Ancillary market values from exploration and transport are more difficult to define in total but indicators include a dredging fleet replacement value of £1 billion.</p> <p>The marine aggregate dredging industry employs about 640 staff, 500 of which are ship crew and the rest provide shore support and administration. A further 600 staff are employed on the wharves that receive UK marine aggregates and about 500 relate to the primary delivery of sand/gravel (i.e. from wharves to the point of initial use) (Charting Progress 2 Defra 2010).</p> <p>With the majority of marine aggregate activity occurring in the Netgain MCZ, the socio economic impact of restricting operations would have a significant impact on the local and regional economy.</p> <p>Marine aggregates are also used in beach replenishment schemes. Large volumes of aggregates are pumped directly from dredgers onto beaches, providing coastal protection as well as enhancing the amenity value and therefore the economy of an area. Restrictions to marine operations would result in alternative sources being identified either on land or further offshore resulting in additional financial and logistical cost of transportation.</p>
10	X		<ul style="list-style-type: none"> <li>Possible cables, pipelines and an aggregate site with an exclusivity agreement prior to future consent (difficult to be exact without accurate GIS data) exist in BAI10</li> <li>Future cabling may be required through BAI10 to connect Zone 3 Dogger Bank Round 3 Offshore Wind Farm to National Grid</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	
11		X	<ul style="list-style-type: none"> <li>Possible pipelines and cables (difficult to be exact without accurate GIS data) exist in BAI11</li> <li>Maintenance dredging at Ports of Tees and Hartlepool (Teesport)</li> <li>Wastewater outfalls and intakes</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> </ul>	The Crown Estate is supportive of BAI 11 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
12	X		<ul style="list-style-type: none"> <li>Teeside Round 1 Offshore Wind Farm</li> <li>Possible pipelines and cables (difficult to be exact without accurate GIS data)</li> <li>Maintenance dredging at Ports of Tees and Hartlepool (Teesport)</li> <li>Wastewater outfalls and intakes</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	
13		X	<ul style="list-style-type: none"> <li>Possible pipelines and cables (difficult to be exact without accurate GIS data)</li> </ul>	The Crown Estate is supportive of BAI 13 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
14	X		<ul style="list-style-type: none"> <li>Possible location of Blyth Round 1 Offshore Windfarm (difficult to be accurate without shapefiles)</li> <li>Possible location of cables and pipelines (difficult to be accurate without shapefiles)</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>Waste water outfall and intakes</li> <li>Wildfowling in coastal areas</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	

15	X		<ul style="list-style-type: none"> <li>• Possible location of Blyth Round 1 Offshore Windfarm (difficult to be accurate without shapefiles)</li> <li>• Possible location of cables and pipelines (difficult to be accurate without shapefiles)</li> <li>• Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>• Waste water outfall and intakes</li> <li>• Wildfowling in coastal areas</li> </ul>	<p>The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified</p>	
----	---	--	--	--	--

Site ID	Opinion of potential sites			Activities ongoing or planned by The Crown Estate in each BAI	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted
	Negative	Neutral	Positive			
16		X		<ul style="list-style-type: none"> <li>Possible location of cables and pipelines(difficult to be accurate without shapefiles)</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>Waste water outfall and intakes</li> <li>Wildfowling in coastal areas</li> </ul>	The Crown Estate is supportive of BAI 16 unless Conservation Objectives and subsequent management measures restrict or impact future activities	<p><b><u>Cables and Pipelines</u></b></p> <p>There are some 18,000 km of telecommunication cable and 2368 km of power cable on the UKCS and a significant proportion of cables exist in the Netgain MCZ.</p> <p>Cables for offshore wind cost between £300,000-400,000perkm depending on the type of cable used. If cables are required to be re-routed around a feature additional kms of cable are required to be financed in and also creates the need for additional geophysical and geotechnical surveys. This results in a significant increase in expense, delayed longer installation times and subsequent loss of operation revenue.</p> <p>With domestic oil and gas production in decline, the UK is now a net importer of gas and the percentage of imported gas is predicted to increase to 80-90% by 2020. Pipelines costs £2million per km to purchase and install. Any relocating of pipeline installation or repair would result in considerable additional cost and time delay to operations.</p> <p><b><u>Natural Gas and Carbon Dioxide Storage</u></b></p> <p>Several areas in the Netgain area suitable for future Natural Gas Storage. The total value of such developments to the UK economy is in the region of several tens of millions of pounds per field.</p> <p>There are several depleted hydrocarbon fields or aquifers areas in the Netgain MCZ that could store CO2 released</p>
17	X			<ul style="list-style-type: none"> <li>Possible location of Blyth Round 1 Offshore Windfarm (difficult to be accurate without shapefiles)</li> <li>Possible location of cables and pipelines (difficult to be accurate without shapefiles)</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>Waste water outfall and intakes</li> <li>Wildfowling in coastal areas</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	
18		X		<ul style="list-style-type: none"> <li>BAI18 lies within an area where offshore pipelines are located</li> </ul>	The Crown Estate is supportive of BAI 18 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
19		X		<ul style="list-style-type: none"> <li>No significant activity, asides small scale coastal activity, i.e. possible waste water outfalls, wildfowling</li> </ul>	The Crown Estate is supportive of BAI 19 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
20		X		<ul style="list-style-type: none"> <li>No significant activity, asides small scale coastal activity, i.e. possible waste water outfalls, wildfowling</li> </ul>	The Crown Estate is supportive of BAI 20 unless Conservation Objectives and subsequent management measures restrict or impact future activities	

21	X		<ul style="list-style-type: none"> <li>BAI21 is on the boundary of Zone 3 Dogger Bank Round 3 Offshore Wind Farm</li> <li>There may be new cables requiring deployment in BA21 to connect Zone 3 to the National Grid</li> </ul>	The Crown Estate recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	<p>from power generation and industrial processes. Restriction to these developments would create a potential loss of revenue and also reduce the UK Government's ability to meet climate change targets.</p> <p><b><u>Coastal Operations</u></b></p> <p>The Crown Estate has an interest in a number of coastal activities situated throughout the Netgain MCZ including Port/Harbour/Marina works and licences, coastal protection works, beach nourishment and licences, waste water and abstraction intakes and wildfowling.</p> <p>Restriction of these activities would result in a considerable loss of revenue to The Crown Estate and therefore the HM Treasury.</p>
22		X	<ul style="list-style-type: none"> <li>BAI22 is within an area where offshore pipelines are located (difficult to be accurate without shapefiles)</li> </ul>	The Crown Estate is supportive of BAI 22 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
23		X	<ul style="list-style-type: none"> <li>Cables located in BAI23 (Connecting island)</li> <li>Potential coastal protection works in this area requiring permission from The Crown Estate</li> <li>Waste water outfall and intakes</li> <li>Wildfowling in coastal areas</li> </ul>	The Crown Estate is supportive of BAI 23 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
24		X	<ul style="list-style-type: none"> <li>BAI24 may lie within an area where offshore pipelines are located (difficult to be accurate without shapefiles)</li> </ul>	The Crown Estate is supportive of BAI 24 unless Conservation Objectives and subsequent management measures restrict or impact future activities	
25	X		<ul style="list-style-type: none"> <li>Located within Zone 3 Dogger Bank Round 3 Offshore Wind Farm</li> <li>There are likely to be many of kms of new cables deployed in BAI25 to connect Zone 3 to the National Grid</li> <li>Existing cables and pipelines are located in BAI25</li> <li>Area has been identified by The Crown Estate for future natural gas and CO2 storage</li> </ul>	The Crown Estate strongly recommends use of an alternative BAI due to considerable levels of socio-economic activity until the BAI boundaries are refined and the Conservation Objectives and subsequent management measures that may restrict or impact the activities are identified	
26		X	<ul style="list-style-type: none"> <li>BAI26 may lie within an area where offshore pipelines are located (difficult to be accurate without shapefiles)</li> </ul>	The Crown Estate is supportive of BAI 26 unless Conservation Objectives and subsequent management measures restrict or impact future activities	

Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)



### Feedback on Broad Areas of Interest following first iteration of MCZ development

**Name:** RenewableUK  
**Sector represented:** Wind, wave and tidal energy

Please note  
 For “Expected impacts for your sector if current activities are restricted” see bottom of table

There has been a recent announcement by The Crown Estate on four demonstration sites for offshore wind technologies which will need to be included in any future work - [http://www.thecrownestate.co.uk/offshore\\_wind\\_demo\\_sites.pdf](http://www.thecrownestate.co.uk/offshore_wind_demo_sites.pdf)

For additional information please see RenewableUK MCZ Briefing Document and letter addressed to Tammy Smalley on our issues with the MCZ process. Both should be attached on email.

Note - A precautionary approach must be adopted as potentially negative development impacts of some management measures mean that the possibility of co-location cannot be considered until further discussion on potential management measures takes place. It is impossible to determine whether co-location is feasible until further detail about management measures, potential restrictions on activity and increases to survey/monitoring costs are scoped.

Site ID	Opinion of potential sites			Activities ongoing or planned by members of RenewableUK in each BAI (courtesy of The Crown Estate)	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management
	Negative	Neutral	Positive		
1	X			<ul style="list-style-type: none"> <li>Outer offshore border of BAI 1 lies adjacent to Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>Further cable deployment may be required in BAI 1 to connect Zone 5 to National Grid</li> <li>BAI 1 overlays cable connecting Greater Gabbard Round 2 Offshore Wind Farm to National Grid</li> </ul>	RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity. If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.

2	X		<ul style="list-style-type: none"> <li>BAI2 is in close proximity/located within Scroby Sands Round 1 Wind Farm (difficult to be exact without accurate GIS data)</li> <li>BAI 1 overlays several active cables connecting Scroby Sands to the National Grid (difficult to be exact without accurate GIS data)</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
3	X		<ul style="list-style-type: none"> <li>BAI 3 lies within Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>BAI3 lies within an area where many kms of cables may be required to connect Zone 5 wind farm</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
4	X		<ul style="list-style-type: none"> <li>BAI4 is adjacent to the outer offshore boundary of Lincs Round 2 offshore Wind Farm site</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
7	X		<ul style="list-style-type: none"> <li>BAI7 lies within Zone 4 Hornsea Round 3 Offshore Wind farm site.</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
8	X		<ul style="list-style-type: none"> <li>BAI8 covers the nearshore corner of Zone 4 Hornsea Round 3 Offshore Wind farm site.</li> <li>A large proportion of BAI8 lies within Zone 5 East of Anglia Round 3 Offshore Wind farm site.</li> <li>There are likely to be many kms of new cables deployed in BAI8 to connect Zones 4 and 5 and Round 2 extensions to the National Grid</li> <li>Round 1 Offshore Wind Farms are located on coastal limit of BAI8 (Inner Dowsing, Lynn and Scroby Sands)</li> <li>Round 2 Offshore Wind Farms and extensions are located within BAI8 (Greater Gabbard, Galloper, Inner Gabbard, Sheringham Shoal, Docking Shoal, Race Bank, Dudgeon, Triton Knoll, Humber Gateway, Westermost Rough)</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>

10	X			<ul style="list-style-type: none"> <li>• Future cabling may be required through BAI10 to connect Zone 3 Dogger Bank Round 3 Offshore Wind Farm to National Grid</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
12	X			<ul style="list-style-type: none"> <li>• Teeside Round 1 Offshore Wind Farm</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
14	X			<ul style="list-style-type: none"> <li>• Possible location of Blyth Round 1 Offshore Windfarm (difficult to be accurate without shapefiles)</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
17	X			<ul style="list-style-type: none"> <li>• Possible location of Blyth Round 1 Offshore Windfarm (difficult to be accurate without shapefiles)</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
21	X			<ul style="list-style-type: none"> <li>• BAI21 is on the boundary of Zone 3 Dogger Bank Round 3 Offshore Wind Farm</li> <li>• There may be new cables requiring deployment in BA21 to connect Zone 3 to the National Grid</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>
25	X			<ul style="list-style-type: none"> <li>• Located within Zone 3 Dogger Bank Round 3 Offshore Wind Farm</li> <li>• There are likely to be many of kms of new cables deployed in BAI25 to connect Zone 3 to the National Grid</li> </ul>	<p>RenewableUK recommends that a different BAI is chosen due to the considerable levels of renewable activity.</p> <p>If renewables are determined to have no impact on the conservation objectives of the site or the management measures do not overly impact the projects then this position may change. More details are required on the mitigation measures and conservation objectives before we could support such a position.</p>



## **Expected impacts for your sector if current activities are restricted**

### **Wind Farms**

We estimate that the investment in Round 3 Wind farms is projected to be in the order of £100billion.

#### ***Socio Economic Impact in the case of Restriction***

Renewable energy and offshore wind in particular are critical to meeting the UK's legally binding 2020 EU energy targets which require 15% of final energy consumption to be produced from renewable sources. Failure to meet this target could result in considerable EU fines. In addition, offshore wind helps improve energy security and will reduce our reliance on imported fossil fuels. Restriction of offshore wind deployment would result in the potential loss of the majority of the UK's target renewable energy production. In the longer term the Committee on Climate Change as stated that the decarbonisation of the power sector by 2030 is critical in meeting the legally binding 80% reduction in carbon emissions by 2050.

Restriction could also lead to a significant loss of national economy revenue e.g. Dogger Bank Zone 3 Wind Farm has the potential to generate a total value of power of billions of pounds a year (The Crown Estate).

Restriction could also lead to a significant loss of national and local employment for construction and operation e.g. In the last 6 months alone, a total of 2350 jobs have been created at a time of recession by the offshore wind sector – see RenewableUK briefing document for more details. Offshore wind could deliver 57,000 jobs by 2020 (Bain & Co).

Restriction could also lead to considerable delays due to possible redesign, relocation of project, additional survey requirements (up to 2 years) in the consenting process resulting in UK Government potentially failing to meet EU 2020 Climate Change targets and possible fines and continued dependence on non-renewable energy (the Crown Estate). These delays could also lead to a loss of operational revenue for the developer which may reduce the benefit on the local or regional economy. Any delays may also lead to a loss in national and local employment due to a temporary reduction in supply chain activity.

There is also considerable financial cost to developer due to potential requirement for micrositing to avoid newly designated features/protected areas, increase in environmental surveys required for EIA and AA, and additional cost of post-construction monitoring, e.g. increase in costs of millions of pounds to obtain consent (the Crown Estate)

Cables for offshore wind cost between £300,000-400,000 per km. If cables are required to be re-routed around a feature additional cable is required resulting in considerable increases in costs and creates the need for additional geophysical and geotechnical surveys (Renewable UK 2010).

Please return to [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)



a million  
voices for  
nature

RSPB Northern England  
1 Sirius House  
Amethyst Road  
Newcastle Business Park  
Newcastle upon Tyne  
Tyne and Wear  
NE4 7YL

Steve Barnard  
Stakeholder Manager  
Net Gain: The North Sea Marine Conservation Zone Project  
The Deep Business Centre  
Hull  
HU1 4BG

BY EMAIL: [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

13 August 2010

Dear Steve

### **Feedback on the potential MCZ areas identified with Regional Hub meetings**

Thank you for the opportunity to provide feedback following the first iteration of MCZ development in the North Sea. The RSPB is pleased to provide comments at this stage and look forward to further consultation.

#### ***Providing feedback***

The RSPB welcomes the provision of a standard pro-forma to help submit comments however we have experienced some difficulty in submitting our comments in this way. At this stage of the project it is difficult to provide a negative/neutral/positive opinion on individual sites this as we feel that the information available for each site is insufficient at this stage. We also feel that it is inappropriate to provide comment on potential management for sites as this has not been discussed in detail at the hub meetings; similarly, there is no information about restrictions on activities to comment upon. As a result of this the RSPBs feedback to the first iteration is provided within this letter. Our comments are focused on achieving the requirements of the Ecological Network Guidance (ENG) and, in particular, highlighting the additional ecological considerations of particular sites.

Please also note that some of the individual maps, or baseline maps, could not be opened. This included, for example, the water level, summer water column and YH\_July 2010\_Table 3 maps.

#### ***How feedback was collected (relating to first page of pro-forma)***

Feedback on the first iteration has been collected internally within the RSPB. This has included liaison between Regional Hub members, national marine staff and reserve staff familiar with the area, totalling 9 people.

#### ***Feedback on sites***

We would like to provide the following general and site specific comments (please note comments relating to the Yorkshire & Humber Regional Hub outputs refer to the outputs from the July meeting):

### *North East Regional Hub*

1. Due to the lack of Fishermap data and concern regarding the accuracy of habitat datasets, it was generally agreed at the North East regional hub that inshore (as opposed to coastal or offshore) sites would not be identified. This is reflected in the absence of any sites identified in this zone, evident on the map combining outputs from the five groups. This lack of sites in no way reflects the lack of ecologically important sites in this zone compared to elsewhere in the Net Gain project area, where a number of Broad Areas of Interest (BAI) have been identified at the last round of hub meetings. When further data is available, identification of potential MCZs within this inshore zone will need to be an urgent priority at subsequent North East hub meetings.
2. Site NE5\_B – this BAI includes a number of areas that support important breeding seabird and wintering waterbird populations, indicating it is an area of high biological productivity. These include little and arctic tern colonies at Lindisfarne and the Long Nanny, and the overwintering geese, ducks and waders at Lindisfarne. However, we believe the BAI's conservation benefits could be significantly enhanced by including a greater area of the sea around the Farne Islands, a particularly bio-diverse area with a range of interests, underlined by its ability to support a globally-important seabird colony supporting several species at internationally-important levels. From the map provided it is unclear to what extent the seas around the Farne Islands have been identified for protection within this BAI, but we believe significant conservation benefits would accrue from protecting adjacent seas. This would have particular benefits for seabirds with more limited foraging ranges, such as razorbill, shag and great cormorant. An alternative approach would be to identify the Farne Islands and surrounding waters as a separate MCZ altogether.

In comparison, NE1\_J and NE1\_K would provide some conservation benefits, but on a much small scale than NE5\_B, and would in no way recognise the biodiversity of the Farne Islands and surrounding waters.

3. Site NE2\_C – Druridge Bay is well-known for its high biodiversity interest, as indicated by its value for range of foraging seabirds in the summer as well as other interests such as harbour porpoise. We welcome its identification. There would be strong conservation benefits to be gained from extending the identified area northwards so it encompasses Coquet Island to the north, a globally-important seabird colony, and further north into Alnmouth Bay, another area of high biological importance, again as evidenced by the large numbers of foraging seabirds, particularly terns, that use the area in the summer.
4. Site NE5\_B3 – we support the identification of waters within the Tees Bay, as these are known to be of high biological richness, supporting a nationally-important colony of common terns that nest on Teesside and commute out to sea to feed, and also large numbers of auks (e.g. guillemot) in the post-breeding period. Conservation benefits would be optimised by identifying a broader area within Tees Bay, and by extending the inshore area of protection northwards past Hartlepool. There is an internationally-important colony of little tern that breed at Crimdon Dene, west of Hartlepool, and the productivity of this thriving colony indicates biological richness in adjacent waters.
5. Sites NE3\_H and NE4\_A – these areas may well be biologically productive, falling within the foraging ranges of some seabird species associated with the Farne Island Special Protection Area (SPA). In order to determine the most appropriate parts of this general area to protect, the

RSPB recommends the use of European Seabirds at Sea (ESAS) data in order to identify concentrations of foraging seabirds – these are likely to be a strong indicator of biologically-productive areas.

6. Sites NE3\_A and NE5\_C – the Dogger Bank is well-known to be an ecologically valuable area, as reflected by its identification as a draft Special Area of Conservation (SAC). It is also known to be an important area for foraging seabirds such as kittiwake from the Flamborough Head and Bempton Cliffs SPA, as well as falling within the foraging range of other seabird species from this colony, such as gannet and northern fulmar. Again, the RSPB recommends the use of European Seabirds at Sea (ESAS) data in order to identify concentrations of foraging seabirds – these are likely to be a strong indicator of biologically-productive areas.

#### *Yorkshire and Humber Regional Hub*

- 1) Site G on the consensus map (please note we were unable to access the information about why this site was identified)
  - a) Additional ecological factors – this area supports internationally and nationally important (typo error in narrative from June meeting – should read important, not improving) breeding seabird populations, namely kittiwake, guillemot, razorbill, puffin, fulmar, gannet and herring gull.
  - b) The RSPB Bempton Cliffs nature reserve is situated within this area and we believe there is benefit to locating an MCZ adjacent to the nature reserve boundary.
  - c) An economic report, provided to Enock, shows the economic benefits the reserve and associated visitor centre brings to the area, equating to 15 full time jobs. The report clearly shows that majority of visitors visit the reserve during the period when breeding seabirds are present, highlighting the value of seabirds to the area.

#### *Lincolnshire Regional Hub*

1. General comments on the sites and spreadsheet:
  - a. The primary reason for using the Marxan output provided as the basis of our mapping exercise was for efficiency, given the limited time available to carry out the exercise.
  - b. The spreadsheet both summarised and reproduced on pages 4-8 of the Lincolnshire and The Wash regional hub document was compiled within very limited time. As a result, the comments provided against each site to describe the rationale for its selection by each sector representative was equally limited.
  - c. The approach agreed from the outset between representatives was to focus on achieving the aim of the exercise to meet or exceed the target areas for each broad habitat type. All agreed compromise was needed to do so and for this reason the aim of the exercise was achieved.
  - d. RSPB agreed for the purpose of the exercise that some sites selected (e.g. LW 4 56 A – The Wash & North Norfolk Coast) would overlap existing designations, provided that the management measures and conservation objectives delivered additional/new nature conservation benefits to those already provided by the existing designations. Likewise, the representatives of the sea users sector at Table 4. compromised over certain sites if the management measures would not restrict certain fishing activities.
  - e. The data available to the RSPB at the 15 June hub related primarily to the locations of breeding seabird colonies along the coast and knowledge of the habitats they associate with, and the distance from the coast specific species will forage. This was information we took the meeting and has been provided to Net Gain (although is not currently available on the ftp site). Our comments below therefore relate largely to areas of importance for breeding seabirds based on this information. Concurrent, or additional,

areas are also likely to be important for seabirds during the passage and wintering seasons.

- f. It is likely that the sites discussed below are of importance for a range of marine wildlife/FOCI, in addition to seabirds, as seabirds will frequently utilise areas that are also rich in other biodiversity or are particularly productive. The provision of additional information at the next round of hub meetings would aid the identification of these areas.

2. Site LW 4 56 A:

- a. The above site is taken to refer to that depicted in red hashing, which covers the Wash and North Norfolk Coast. The spreadsheet also refers to a site '56', but it is not clear from the map that this is distinct from site LW 4 56 A. For clarity, our below comments relate to this latter site.
- b. The Wash and North Norfolk coast is important for nationally and/or internationally important populations of breeding and wintering seabirds. A number of these species are associated with the sandy sediments broadly covered by the selected site. These species include fulmar and little, common and Sandwich terns.
- c. The spreadsheet entry for 'RSPB' (which states 'Green, tern, (gannet), fulmar, foraging') is intended to describe the above rationale. 'Green' denotes that the site is not contentious for the RSPB – clearly we recognise that this may not be the case for other sea users. Gannet is included in brackets as gannet are a wide-ranging species, capable of ranging up to 540km, or greater, distances from their breeding colonies and are also associated with sandy sediments. The internationally important colony of gannet at Bampton Cliffs are within foraging range of the Wash and North Norfolk Coast, and it may therefore benefit from designation of MCZs covering habitat types gannets associate with in this area.

3. Site LW 4 77 A:

- a. This site was primarily selected (within the constraints of the exercise) in order to meet the target set for the 'coarse sediment' broadscale habitat type.
- b. RSPB noted that this site was generally outside of the core foraging range of a number of seabirds from their coastal breeding colonies. For example, little terns - which breed in internationally important numbers on the North Norfolk coast - will forage c.10km offshore from the colony, whereas Sandwich terns have been recorded foraging up to 60km offshore from the North Norfolk coast.
- c. The site was expanded to include additional areas of sandy sediment likely to be of importance for more wide ranging seabirds associated with this habitat type, such as Sandwich terns (which are also associated with coarse sediments/gravel substrates).

4. Site LW 4 69 A:

- a. As above, this site was selected to contribute towards the coarse sediment targets, but also incorporates sandy sediment habitats and is within the foraging range of the breeding colonies of a number of seabirds associated with this habitat. The description 'Green – foraging' against the site for the RSPB intends to describe this.

5. Site LW 4 119 A:

- a. Flamborough Head supports breeding seabird populations of national and international importance, including species such as kittiwake, guillemot, razorbill and puffin. The site encompasses an area of sandy sediment within the core foraging range of these species, and so the descriptor in the spreadsheet for this site is 'near shore foragers'; the description 'onshore foragers' in 'Table 4' is incorrect and should be amended.

6. Sites LW 4 82 A; 52A/B; 70 A; 72B:
  - a. These sites are each described in the spreadsheet as 'limited value for breeding birds'. It should be noted however that this reflects the fact that they are too far offshore to be within the foraging range of the majority of seabirds that breed on the Net Gain area coastline. This does not mean that these sites are not indirectly important for breeding seabirds (for example as spawning grounds for key fish prey species for seabirds).
  
7. Site LW 4 25 A and LW 4 33A:
  - a. These sites cover sandy sediment habitats within the core foraging range for breeding seabirds associated with this habitat type. With respect to site LW 4 33 A, an internationally important colony of little terns breeds at North Denes, Great Yarmouth. Little terns and common terns also breed at the Benacre to Easton Bavents and Minsmere Special Protection Areas; site LW 4 25 A would protect the core foraging habitat of these – and other – breeding seabirds, as well as the associated marine biodiversity.

#### *Eastern England Regional Hub*

As you are aware, the RSPB representative was unable to attend the 17 June East of England hub meeting due to unforeseen circumstances on the day. As the exercise carried out at the Lincs and The Wash hub enabled RSPB representatives to also propose sites within the East of England hub area, we suggest that the relevant sites and comments above are taken as our contribution to the Eastern England hub, in this instance. This is with the caveat that this contribution was limited by an RSPB representative not being available to fully participate in the Eastern England hub.

#### ***Additional support for next iteration (relating to first page of pro-forma)***

Based on the feedback comments made earlier, the RSPB would like to make the following suggestions:

1. It is helpful to have one map for each hub showing all the suggested MCZs and the site codes given by each group/table for each site – this is not available for the outputs from the repeat Yorkshire & Humber hub meeting.
2. It is helpful to view a composite map showing the outputs from all four hubs (as in the supplementary information provided to the SAP). Signposting to this, or provision of the map within this section of the ftp would be useful
3. It is helpful for the regional maps to be accompanied by one additional document detailing the reasons for identifying each site, cross referencing to the same code on the map.
4. It would also be helpful if these maps and associated information were in a separate 'first/second/third iteration feedback' folder on the ftp site to enable easy location finding.
5. It is currently difficult to establish how the responses you receive through this consultation will be used. An explanation of this would be helpful.
6. It would be useful to be able to view all the responses made. They could be posted for viewing on the 'first iteration feedback' folder, as suggested above.

#### ***Additional comments***

In addition to the comments made above, the RSPB would also like to make further suggestions that we believe will help the identification of potential MCZs at future meetings.

1. Presentation of all the ecological data in one map, particularly the broad scale habitats and FOCI maps, to aid easier identification of sites that fulfil more than one ENG criteria.
2. Provision of information, and reference to, the additional ecological considerations referred to in the ENG. For example:
  - a. seabird data and maps provided by the RSPB

- b. Data provided through SeaSearch
  - c. Data sources suggested by the RSPB and the Wildlife Trust for data relating to, for example, cetaceans, spawning areas and seabirds.
3. Consideration of providing all ecological data in one map to enable the identification of potential MCZs that support a range of the requirements of the ENG – this should encompass the broad scale habitats, FOCI, additional ecological considerations (e.g. spawning areas, seabirds, cetaceans). Potentially, a data programme could assist in this process by identifying hotspot areas.
4. Additional information on the FOCI maps. For example, the density of each species at each location to enable comparison between sites.
5. Provision of a brief summary outlining the interest features of the SACs, SPAs, SSSIs and nature reserves. The RSPB would be happy to provide a brief synopsis of our coastal reserves.
6. Where additional information is provided in the 'Regional Profile – notes and explanations of map' reference should be made to this in the legend of appropriate maps e.g. water column maps.

Please note that these suggestions have already been outlined in a letter sent to Joanna, dated 7 July, alongside our concerns about the submission made to the SAP, to which we have not received a response. We have also made these suggestions, and others, through communication with the data team at meetings and through emails. I would be happy to discuss these suggestions with you further.

I hope you find these comments and suggestions useful and hope they can be adopted for the next round of hub meetings. If you have any questions please do contact me, however please note that, I am leaving the RSPB on 13 August. As detailed in my email dated 5 August, future correspondence should be made through Martin Kerby (martin.kerby@rspb.org.uk).

Yours sincerely



Gillian Flint  
Policy Advocate

[Gillian.flint@rspb.org.uk](mailto:Gillian.flint@rspb.org.uk)

Direct dial: 0191 233 4331

cc.

Martin Kerby, RSPB (North East Regional Hub)

Michelle Lindsay, RSPB (Yorkshire and Humber Regional Hub)

Amy Crossley, RSPB (Lincolnshire and Eastern England Regional Hub)

Mike Jones, RSPB (Lincolnshire Regional Hub)

Kate Tanner, RSPB

Kirsten Smith, Yorkshire Wildlife Trust



4<sup>th</sup> August 2010

Dear Steve,

On behalf of The Wildlife Trust staff engaging within the Net Gain project we welcome and thank you for the opportunity to submit feedback regarding the current identification of MCZ sites within the Net Gain area.

We recognise the need for a short deadline regarding feedback, however due to the manner in which feedback is required and the tight deadline attached to it we are unable to submit information through the suggested forms. I suspect this will also be the case for other stakeholders and suggest in future a longer deadline would likely allow more stakeholders to contribute feedback in this manner. Accessing the maps is also difficult and time consuming; creating a specific folder on the FTP site for maps requiring feedback would allow easier access to site information.

In response to the comments mentioned on the form regarding 'additional support materials' that would be useful, please see below:

- Ecological data (as I'm sure you're aware) is lacking. Presentation of data that will aid identification of 'additional ecological features' as outlined within the ENG is needed. Examples of this include dive data supplied via Seasearch and bird foraging data supplied via the RSPB. An indication would also be useful regarding the deadline that the project will accept new data as dive data will be collected until September and will be of great use in identifying inshore MCZs.
- Presentation of all ecological data in composite data layers – allowing overlay of information onto the EUNIS seabed and deep sea data is needed. Acetates go some way to achieving this; however the ability to view this on a GIS screen and to switch layers on and off would significantly help with identification of MCZs based on more than just seabed characterisation. Inclusions of EUNIS, FOCI data, protected site boundaries, coastal nature reserve locations, dive data and bird and marine mammal data would be a useful starting point.
- Further information regarding FOCI species and habitats. For example an indication of density at each FOCI locality rather than just a specific point would allow prioritisation of identification of MCZs within areas in which FOCI are located.
- Appropriate explanation of maps through clear legends. By means of example the SFC closure map indicates many areas of the North Sea are in fact closed to fisheries. This is incredibly misleading as many of the closures just apply to one specific gear type or for a very restricted time period. Further information is required regarding what species the closure is for, what gear



type it applies to and for what time period. If data such as this is not presented there is the danger that stakeholders will interpret these sites as existing protected areas and limit their inclusion within MCZs.

I hope these comments are of use and that some (if not all) can be adopted for the next round of hub meetings in September.

The marine environment is a very dynamic environment, requiring delicate balances between processes in order to keep it in at the very least a 'favourable' condition. Whereas to date the FOCI, EUNIS and deep seabed data has provided a starting point for identification of MCZs for stakeholders there is now a real need to look at other factors outside of this.

Yours sincerely,



Kirsten Smith  
North Sea Marine Advocacy Manager

Cc'd:

Steve Lowe – Northumberland Wildlife Trust (North-East Hub)  
Paul Learoyd – Lincolnshire Wildlife Trust (Lincolnshire Hub)  
Caroline Steel – Lincolnshire Wildlife Trust (Lincolnshire Hub)  
John Hiskett – Norfolk Wildlife Trust (East of England Hub)  
Joan Edwards – The Wildlife Trusts  
Richard White – The Wildlife Trusts  
Lissa Goodwin – The Wildlife Trusts

Claire

Thank you for the opportunity to comment on this.

Below are the comments from [The Crown Estate](#).

1. *'Socio economic data will be useful to decide amongst candidate MCZ locations but should not be used to rule out possible places to protect'...and 'it is wrong to rule out consideration of an area for pMCZ on the grounds that it would be inconvenient to a particular sector, i.e. wind farms may be suitable although not as a reference site.*

Whilst The Crown Estate understand the SAP is required to ensure the project teams follow the ecological guidance in identifying FOCI/habitats in designating pMCZs, we are unsure of the SAP role in providing advice on socio-economic activities and would therefore like clarity on this point.

2. *SAP recommend better liaison with N Ireland, Wales, Scotland and Isle of Man on 2<sup>nd</sup> iteration*

The Crown Estate strongly agrees with the SAP that there needs to be greater engagement between adjacent MCZ groups to ensure compatibility within the 'coherent network of MPAs'. Some areas of industry are being affected by different approaches/decisions being made from adjacent MCZ Groups and therefore it is very important that all MCZ Groups follow the same approach and liaise accordingly.

3. *Currently none of the existing MPAs (SACs etc) have been included in the 1<sup>st</sup> iteration. The SAP recommends inclusion as some existing MPAs will benefit from additional protection.*

The Crown Estate agrees with this advice as it is difficult to comment on the 1<sup>st</sup> Iteration when it is likely the Broad Areas of Interest / Building Blocks of pMCZs are most likely to change once existing MPAs are considered. In addition, consideration of existing MPAs as pMCZs will 'free-up' other areas of seabed and assist the creation of the network of MPAs and also reduce the need to impact economic activities.

4. *SAP recognise that groups are still waiting on guidance from JNCC/NE but recommend draft Conservation Objectives for pMCZs be drawn up for 2<sup>nd</sup> Iteration*

This is critical to the stalling of the development of the pMCZs at present as it is not possible to know what the management measures are likely to be for each pMCZ. This has resulted in the stakeholders involved in socio-economic activities taking a 'guarded' stance to the process. Guidance needs to be provided for all sectors, i.e. aggregates/ cables / pipelines /fishing / renewable etc.

5. *The SAPs considered whether co-location was desirable/feasible and concluded that there were advantages and disadvantages but that co-location was acceptable and potentially beneficial from a scientific point of view.*

It should not be automatically assumed to be beneficial from a scientific point of view. For example, offshore wind farms have the potential to provide alternative hard substrate; in an environment of soft bottoms this has the potential to attract additional species some of which may not be compatible to the original conservation objective and feature being protected. At this stage there is no definitive guidance on co-location and therefore stakeholders will find it difficult to accept it as beneficial.

Kind regards  
David

Tuesday, 31 August 2010

**Claire Herdman,**

**Re: Environment Agency Comments on the first iteration of Marine Conservation Zones.**

Thank you for consulting us on the first iteration of Marine Conservation Zones (MCZ). I have put together some informal comments. Please give me a call if you would like to discuss any points that I have raised.

These projects seem to be progressing very well considering the short amount of time that you have had so far. They have indicated the initial idea of how the MCZ network might look apart from Net Gain which unfortunately we do not have suggested sites for as yet.

We have a few generic comments that we would like the projects to consider:

**Levels of protection**

There must start to be decisions on the level of protection needed to manage our wildlife. This information is critical for all managers, users, regulators and interested parties. There is still a lot of uncertainty over what the levels of protection for the sites will be. This and the conservation objectives for sites will dictate what activities are and are not compatible with each MCZ. This is an important area and although controversial an idea of what type of protection/ management is needed for a certain habitat or species is important.

**Inshore/ estuarine sites**

The projects have found that areas close to the shoreline are generally more contentious. This must not prevent important habitats in these areas being considered as part of the network. We are particularly concerned that fish species along with other biodiversity is considered for protection as part of this process. We have provided reports for the estuaries where we have data to support any recommendation for protection. We are happy to provide the raw data used for these reports to any of the projects we have already provided this information to the Finding Sanctuary project.

Estuaries are both important migratory corridors as well as vital marine fish nursery grounds. Article 10 of the EC Habitats directive which is concerned with enhancing ecological networks encourages the management of these features due to their importance for wild fauna and flora. Our data illustrates the nursery function of certain estuaries. We hope that this will enable discussion by each of the projects about the applicability of MCZ within their estuaries. We note that Balanced Seas has put forward a number of estuary locations and hope that juvenile fish and intertidal habitats will be a consideration within these proposals.

We consider that this approach is supported by the Ecological Network Guidance.

Under the seven MPA network design principles (chapter 4):

- Representativity (4.2)  
Species: Smelt, European eel and annelid worms found in tidal or lagoon waters.  
Habitats: Intertidal habitats and in particular; mud, sediments dominated by aquatic angiosperms, coarse sediments, sand and muddy sand, Intertidal mixed sediments, coastal saltmarshes and saline reedbeds, seagrass beds and in some locations *Sabellaria* reefs.
- Adequacy (4.4) most of the broad scale habitats that we are interested in do not have an indicative percentage. Some of these habitats are reducing due to anthropogenic pressures and also in particular climate change acting against hard coastal defences. These areas should also be protected to a sufficient size to enable the feature's long-term protection and recovery.
- Protection (4.7) We would also expect that the conservation objectives of the sites would help to delivery Good Ecological Status under the Water Framework Directive. This is particularly important in estuaries where Marine Strategy Framework Directive does not apply.

#### **Areas of additional ecological importance (chapter 5):**

- Our WFD data for fish in estuaries should be used to and this is supported by the ecological considerations:  
*“When selecting MCZs, particular attention should be given to including important areas for key life stages of species such as spawning, nursery or juvenile areas”. Regional projects should be identifying areas of additional ecological importance for: “mobile species may aggregate in discrete locations at particular stages in their life cycles or to undertake specific behaviours.....This may include spawning aggregations and nursery areas for mobile species which play a crucial role in sustaining populations and maintaining ecosystem function (IUCN-WCPA 2008). Designing areas known to be especially important for species will contribute to the long term viability of protected populations and help increase connectivity within the MPA network”.*

In some cases, and in particular for fish species or environmental standards needed by the conservation objectives, our expertise will be important. For example we have eel management plans and these need to be understood in relation to proposing management for this species through a Marine Conservation Zones in combination with other management tools that are available for this species.

#### **Conservation Objectives**

It is important as a regulator that there are clear conservation objectives and environmental outcomes for each site; these should be relevant to our activities. We recognise that at this stage the sites are just being identified, however we would like to use this opportunity to emphasis the need for clear conservation objectives in order to determine whether our activities or those we regulate have the potential to adversely effect these sites. We will need advice on the environmental conditions that should be achieved on a site. This is something we would expect the statutory nature conservation bodies to help the regional projects with.

In particular we have been asking for clarity over the consideration of our existing environmental permits during the development of these new sites. We are aware that there are likely to be some instances where the environmental gain will outweigh the economic loss associated with amending or reviewing a licence. Defra had previously also confirmed that when site proposals are submitted this would include advice concerning the presence of our existing licences. They also confirmed that as part of identifying the sites there would need to be an assessment of the economic loss (including whether compensation would be payable) against the environmental gain of designation the MCZ. This assessment would help in determining whether the site is a realistic candidate for designation in the first place. As yet we have not been aware that the projects have been given any advice as to how this might happen or how to take our permits into account. In regards to our discharge consents, the regional projects will need to consider, if improvements to sewage treatment works are required to meet the conservation objectives, how much this will cost water companies and the cost associated with increased energy use.

This consideration is very difficult especially without conservation objectives for the sites. The review of consents for Habitats Directive sites have taken us a number of years and highlighted the technical difficulties where the water quality requirements for certain habitats or species are not well understood. There will need to be clear risk based criteria and measures developed in partnership, for our regulatory functions to ensure that our decisions do not adversely affect the integrity of the MCZ. In most cases we expect there are unlikely to be robust water quality data sets providing a baseline for the conservation objective. We will need to be clear on what are the critical water quality and physical (e.g. proximity to MCZ, tidal currents, temperature etc.) parameters that need to be taken into account for the maintenance of the conservation features that we will be seeking to protect through our monitoring and permitting activities. We will need a workable mechanism to be able to continue to proportionately regulate emissions to water. We would be glad to discuss this further and there will be a need to work with the regional projects, MMO and statutory nature conservation bodies to make sure that this is possible.

### **Data**

We would support the use of “best available evidence”. The use of data older than 30 years might well be appropriate especially for stable habitats or to identify areas being impacted by a certain activity. Older data might also help to show the impacts that more recent activities are having on the habitat.

The various different responses from the Science Advisory Panel, mention data available from the Environment Agency. In case regional projects want access to other aspects of our data here is a list of what we have provided so far (as far as I am aware, and I was not involved in some of the data collection):

Nationally:

- Benthic Invertebrate

- Rocky shore macroalgae
- Seagrass (point ground truth data - i.e. percentage cover in quadrats, species present)
- Saltmarsh (point ground truth data - i.e. percentage cover in quadrats, species present)
- Smelt report
- Eel report pending final comments should be finished in September.
- Discharge consent points

Finding sanctuary:

- Report on Marine Juvenile Fish in Estuaries
- Fish species data within transitional waters.
- Benthic data for the river dart including records for tentacled lagoon worm
- Regional coastal habitat mapping project (intertidal data)

Netgain:

- Report on Marine Juvenile Fish in Estuaries

Irish Sea Conservation Zones:

- Report on Marine Juvenile Fish in Estuaries

Balanced Seas:

- Report on Marine Juvenile Fish in Estuaries
- EA Sea Area Saltmarsh Surveys (2007-08)
- EA CCO SRCMP Habitat Mapping data for SE Region (Flood and Coastal Risk Management)
- Thames 2100 project data
- Charles Middleton's MSc: *The Thames Estuary: An Evidence Base for Areas That Should be Protected Through Marine Conservation Zones Legislation Following the Enactment of the Marine and Coastal Access Bill*
- marine species data which Ian Humphreys has/is pulling together (Unicomarine database)

Kind regards,

Toni Scarr

Senior Marine Advisor,  
 Environment and Business  
 01276 454420  
 Environment Agency,  
 8th Floor Eastbury House,  
 30-34 Albert Embankment,  
 London. SE1 7TL.  
[antonia.scarr@environment-agency.gov.uk](mailto:antonia.scarr@environment-agency.gov.uk)  
[www.environment-agency.gov.uk/marine](http://www.environment-agency.gov.uk/marine)

From: CFA [mailto:plms@clydefish.org]  
Sent: Fri 13/08/2010 3:06 PM  
To: Steve Barnard  
Subject: Net Gain First Iteration

Dear Steve,

Today is the deadline for NCS comments on the Net Gain First Iteration. You are going to be impressed with neither the depth of the intellectual quality of this response, nor its length, but it is the best I can do with the information presented to me.

1. First, the SFF is not surprised to hear of the difficulty which has been experienced in trying to keep up with the timescale set by Natural England. Your Project was presented with an impossible task, the equivalent of the biblical building a house with bricks made of straw. We are concerned, that the lessons learned will not result in an extension so that the progress is more measured and therefore inclusive. It fears, and there is some evidence for this, that an attempt will be made to reach a conclusion within the existing timetable no matter the standard of the result.
2. The conclusions which had been reached which are to identify candidate sites within existing MPAs has drawn a point of substance to our attention. In 1.1 it is said, correctly, that the inclusion of MPAs is not based on an assumption that the broadscale habitat features are afforded adequate protected (sic). We do think that objective judgements in relation to MPA identification cannot be made without having some broad indication of what restrictions might be necessary in order to achieve the conservation objective. In other words stakeholders must not be pressed to identify and settle upon candidate sites without knowing the Project's view as to the necessary management measures. This is particularly true when it is the fishing industry being asked for its consent.
3. The concern about management measures has been heightened by the SAP general observation in the second paragraph of section 2.2.3 in its response to the Finding Sanctuary presentation on 5 July 2010. I need not repeat it but suffice it to say whether or not fishing effort information is supplied by industry, Projects are being invited to target, amongst others, areas of high fishery production.
4. This in turn leads to another concern which is that the information (or more correctly the lack of it) being produced on which identification decisions are to be based does not impress the stakeholders represented by the SFF. This in turn leads to a loss of any confidence in the whole process. As an aside, I have to say it does not help those of us who asked fishermen to take part in the process and are now being met with criticisms of our own judgement about that process.
5. MPAC is to meet on 23 August prior to its meeting with Natural England. It may be that it will be decided to take a national approach to the problems which are arising. However I would be very grateful if I could discuss the process with you on the telephone before then. I am not in office on Monday. Would it be possible for you to telephone me sometime during the remainder of that week?
6. I wish to emphasise that there is no criticism of the commitment and enthusiasm of the Project Team. Rather there is sympathy for the position in which it finds itself and a great fear of what the future holds, which is already subject to intolerable pressures, once the juggernaut has passed.

Regards,

Patrick Stewart

Marine Legislation Consultant  
Scottish Fishermen's Federation  
PO Box 9261  
CAMPBELTOWN  
Argyll PA28 6YE

13/08/2010 15:06:26

Tel; 0044 (0)1586 551717  
E-mail: plms@clydefish.org

Claire

Sorry for missing your deadline, comments from WAG re first iterations and SAP feedback is as follows:

a) with the outcome of an ecologically coherent UK network in mind, what consideration or thought is being given to how the outputs from the Regional Projects contribute to a UK network including how they relate and complement other MPA/MCZ projects across the UK?

b) From Welsh perspective we obviously have more of an interest in the outputs from the Finding Sanctuary and the Irish Sea Conservation Zone projects. WAG has an understanding with both projects in that we will have early sight of emerging proposals/areas before they are published. This didn't happen for the first progress reports and this may be because there are still a number of uncertainties however given our interest in ensuring that the Welsh MCZ project is joined up with rest of UK and given WAG's responsibility for fisheries management in the offshore areas of FS and ISCZ it's vital that we have early sight/notice of emerging proposals.

c) Following on with the issue of fisheries management, what consideration is being given at UK level re the management of foreign vessels in UK waters? For example, and I accept that the areas are subject to change, the areas identified in the Welsh offshore zone of ISCZ project are fished by UK and foreign vessels - if the designations go ahead and they require fisheries management measures there's a possibility that UK vessels will be effected and not foreign vessels, unless there is some dialogue and agreement with EC to do otherwise?

d) Reference sites - it's noted that so far none of the Regional Projects have considered or given any real thought to identifying reference sites and this seems to be down to a lack of clarity on what's required. Will there be any further guidance (Gvt or SNCB) regarding this issue?

With regards to

thanks  
Louise



## Collation of feedback received following Second Iteration (as of 13<sup>th</sup> January 2011)

### KEY - Source of feedback – respondents:

1. BSAC (YH Hub)
2. BMAPA
3. SSE Renewables (EE Hub)
4. Wildlife Trusts
5. RSA Hub member NE Hub
6. Scottish Power & Vattenfall (EE Hub)
7. RSPB
8. RWE npower EE Hub
9. RWE npower LW Hub
10. ESFJC (EE & LW)
11. Scottish Power Renewables
12. RSA Stakeholders (NE Hub)
13. Offshore wind interests (esp Forewind) \*
14. Commercial fishing stakeholders 1 (EE & LW Hubs) – Kings Lynn
15. Commercial fishing stakeholders 2 (EE & LW Hubs) – North Norfolk
16. Commercial fishing stakeholders 3 (EE & LW Hubs) – Lynn Shellfish
17. Renewable UK \*
18. The Crown Estate \*
19. Durham Heritage Coast (NE Hub)
20. NSFC (NE Hub)
21. Natural England (EE Hub)
22. Natural England (LW Hub)
23. Natural England (YH Hub)
24. Natural England (NE Hub)
25. MOD
26. Rederscentrale (Belgian Fishing Fleet) – NCS
27. Sheringham Fishermen's Association
28. Caister Inshore Fishermen's Association
29. Lowestoft Fishermen (Anglian FA)
30. Wells and District Inshore Fishermen's Association
31. Sheringham Shoal
32. Feedback collated by NE area Liaison Officer
33. Feedback collated by YH area Liaison Officer
34. Feedback collated by EE area Liaison Officer
35. NFFO (NE area)
36. Environment Agency



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                      Ruth Thurstan  
Sector represented      BSAC divers  
Regional Hub              Yorkshire and Humber

Please explain briefly how the feedback you are presenting was collected: I emailed BSAC club mailing lists within the Yorkshire and Humber area

Please indicate how many people you have been able to discuss this feedback with: Very few in person – not enough time. I contacted over 40 clubs by email.

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

I would like more time to contact people personally. I suspect that people did not like to be contacted saying that they had to feed back within a matter of days. In addition, they were expected to read a 120 page report, which I was told put people off (others simply did not have the time to read it throughout the working week). It also wasn't clear on the website where exactly the draft sites were being shown. I would like to see a dedicated webpage within the site (well advertised and easy to get to) showing the draft sites very clearly. If people then want more information they can be directed to the report.

Please see below for feedback:

My feedback:

*. How people feel about the individual sites i.e. their location, positioning, impact upon activities, importance.*

MCZs are currently being placed in areas that attempt to minimise impacts on human activities such as fishing. This makes a lot of sense, and I am glad to see that socio-economic factors are being taken into account. However, I also believe there is a real danger, particularly with fishing activities, that by avoiding some of the more productive sites, areas that have traditionally been areas of high diversity and with high abundances of marine life (hence targeted by fishers) will not be represented within MCZs.

I would like to see 'recovery' of habitats a priority within MCZs. Setting conservation objectives to keep the sites the same as they are now would only allow us to keep our seas in the neglected state they are already in. We have been heavily fishing our North Sea for over 150 years. It is **vital** that we start protecting areas of our seas properly, taking into account the enormous changes that have taken place long before living memory.

Some of the inshore areas should be larger.

*. Suggested adjustments to boundaries to improve conservation benefits, reduce impact or improve potential management.*

I would like to see 'buffer zones' around reference areas (i.e. no-take zones), where activities such as trawling or dredging are banned. This would improve the habitat around the no-take zones and allow faster recovery. It would also discourage illegal fishing and make enforcement easier if there is little reason for trawlers to enter the area.

*. Expected impacts for our sector if current activities are restricted.*

I would like to see divers be able to access inshore sites, as allowing diving and monitoring of the area will encourage stewardship of the site, will have few negative impacts (there may have to be regulations on speed of boats and anchoring depending upon the habitat protected) and will improve knowledge of the area.

*. Any other comments that people would like to make.*

Whilst reference areas will be hard to implement, these are the only way we will see real conservation benefits to our seas. Partially protected areas are unlikely to do much in terms of real recovery. Enforcement should also be made a priority. Australia, California and New Zealand have implemented networks of no-take zones, so we should be able to do the same!!

Reference areas should also be of a decent size i.e. greater than 20km across.

**Feedback from another diver:**

*. How people feel about the individual sites i.e. their location, positioning, impact upon activities, importance.*

I am pleased that some large offshore areas are being considered - I feel it is important to protect significant parts of the sea for MCZs to be truly effective.

I feel strongly that more inshore areas should be protected, and that areas such as NG2.14 which are considered too small to be viable (<20sq km) should be extended to make them a viable size. As a diver inshore areas are most often visited by us and where we would see most impact.

From the diver's perspective, the more damaging activities (dredging, trawling, gravel extraction or dumping (of dredged material or anything else) are restricted the better it is for divers as we are principally interested in viewing the seascape and marine life and we prefer it in an abundant and undamaged state.

*. Suggested adjustments to boundaries to improve conservation benefits, reduce impact or improve potential management.*

I would propose extending NG2.15 east and south to include the reefs off Sand's End (west of Whitby) and to the east of Whitby and down towards Robin Hood's bay

They are a rare area of visual interest (rocky reefs) in a generally sandy/muddy seabed and a potential nursery for commercial species such as the common lobster and edible crab that should be properly managed.

I would propose a single umbrella area covering the sea out to the 3nm limit along the 'netgain' entire coast to which at least some basic protection would be provided, including banning of scallop dredging - there is good precedent for this from our own history (prior to 1980 scallop dredging was not permitted inshore in this country in any case, recent activity such as Lyme bay has shown strong support for protecting inshore areas) and from other countries (e.g. Norway) where this method of fishing is banned close to shore. 6nm would be better.

*. Expected impacts for our sector if current activities are restricted.*

In general restriction of other activities (commercial fishing, dredging, etc.) benefits divers because we can access areas otherwise off-limits and because the negative effects on dive sites (damage to seabed, removal of marine life, plumes of silt etc.) of those activities are reduced, leading to healthier dive sites and better diving.

I strongly feel that recreational diving should be permitted across all MCZ's unless there are very good conservation reasons for local, specific (perhaps seasonal) restrictions on access to protect key species or key habitats from stress AND commercial activities are also restricted in those areas (there is absolutely no sense in stopping diving if someone can trawl a location for example)

Diving is a very low impact, non-damaging activity and is of great benefit in providing regular informal monitoring of the state of the zones. (witness sea-search)

Equally important, divers provide important income to local boat-operators and other tourist related businesses (B&B, Restaurants & Pubs, etc.) This has the potential to offset perceived losses from restrictions on fishing and support a more diverse economy.

*. Any other comments that people would like to make.*

I feel that the penalties for breaking the restrictions or causing damage (either wilful or by neglect) in MCZ's must be sufficiently harsh to offer a real deterrent to commercial interests who might be tempted to break the rules - e.g. large fines, impounding or destruction of equipment and removal of licenses to operate.

I have not seen much mention of marine pollution in the reports, is this within the remit of Netgain? Can restriction be placed on dumping of garbage/sewage/chemicals etc, in or which might affect a MCZ? If so then such restrictions should be put in place as far as possible to encourage good stewardship.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                      Mark Russell/Graham Singleton .....

Sector represented    Marine Aggregates .....

Regional Hub            East coast, Lincolnshire & Wash and Yorkshire .....

Please explain briefly how the feedback you are presenting was collected:

Engagement and dialogue with all BMAPA member companies with interests in the region and also Westminster Gravels (a non-member) via electronic means and telephone conversations

Please indicate how many people you have been able to discuss this feedback with:

Five producing companies

General comments

i. Uncertainties surrounding compatibility/management measures

While the process is working well and while in many cases dMCZ proposals have been adjusted to take account of marine aggregate interests which is welcomed, it remains very difficult to offer positive support for proposed sites close or adjacent to marine aggregate interests in the continuing absence of clarity over what the management implications will be for the sector. This is not only in terms of the implications from potential direct impacts – where an aggregate interest falls within a dMCZ site – but also the potential indirect impacts which could implicate interests that lie outside of proposed dMCZ sites. For this reason we feel we have no option at this stage but to adopt a precautionary stance, and offer a negative opinion on dMCZ sites which potentially interact with marine aggregate interests.

It is important to reiterate that as a sector, we very much remain supportive of the MCZ process and overall aims. We also believe that our concerns could be overcome through the confirmation that robust, evidence based tests of significance of activities on site features will be adopted to determine compatibility – as already occurs for SAC feature designations. In these situations, the acceptability of consented activities would be determined by whether they are likely to have a significant impact on the features for which the site has been designated. As the vast majority of dMCZ sites that are associated with marine aggregate interests are broadscale sand/mixed/coarse habitats, which are both wide ranging and common, we consider it highly likely that the significance of any impact will be negligible – particularly with the adoption of appropriate mitigation and management measures. However, these assumptions/principles need to be formalised as soon as possible to allow operators greater certainty as to the real world implications of these sites. In turn, this would permit a greater level of support for sites to be offered.

ii. Avoidance of habitats already subject to direct/indirect impact pressure

It is important for site selection decisions to take into account existing activities that may have modified the habitats that are intended to be protected – both directly and indirectly. The ENG does comment on the desire to try to avoid areas that have been subject to anthropogenic modification, so this would suggest that long standing marine aggregate production licence areas and their secondary impact zones should be avoided wherever possible in dMCZ proposals - particularly as the associated habitats appear to be widespread across the region.

iii. Gap analysis and implications of SAC/SPA coverages

Going through the report, section 5 discussed the revised gap analysis of existing protected areas (SAC, SPA etc), and the assessment of adequacy presented under table 1 sets out the % coverages/requirements for broadscale habitats based on both the gap analysis and the proposed dMCZ sites. It is important to be clear whether the revised gap analysis coverages that have been calculated relate only to the designated features (sand banks/reefs) defined and protected under the SAC/SPA designations, or whether they simply relate to the presence of certain broadscale habitat types that may occur within each sites boundaries. This is important as the industry has licensed interests within a number of the SAC sites. As things stand at the moment, because these are not having a direct effect on the sand bank features (we are extracting relict sand and gravel deposits) or a significant indirect effect on the designated features for which the site has been protected, these activities should be able to continue. However, if the intention is to widen the level/extent of protection beyond the site designated features currently protected this would have significant implications which are currently not being picked up through the Net Gain process.

iv. Outstanding BAI's

We note that there are a number of BAI's identified through the recent East of England Hub process that were not amended and adapted into dMCZ proposals that could potentially interact with marine aggregate interests – specifically sites 1\_B, 2\_E and 2\_G. While recognising that these are not discussed in the second iteration report, and also that the adequacy of many of the broadscale habitats already appear to be adequately covered by the dMCZ options proposed, we would reiterate that any further development of these areas towards dMCZ status will need to give careful consideration to the extensive marine aggregate interests which are present.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
2.1	x			<p>Boundaries of the dMCZ have been amended to exclude existing and proposed marine aggregate interests, although numerous areas &amp; interests lie immediately to the east. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to between £3.4 - £8.55M per km2 of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>



2.5	x		<p>Boundaries of the dMCZ have been amended to exclude existing and proposed marine aggregate interests although some licensed areas lie immediately to the north. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £6.4M per km2 of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>
-----	---	--	--	--	---

2.6	x		<p>At present the site proposal could have a direct impact on marine aggregate interests. Without clarity on the implications of this it is scored negative.</p> <p>As the commentary indicates, the boundary of the proposed site is not aligned with the Docking Shoal feature, and it is understood that the key features of interest lie on the shoal itself and into the Race Channel. Area 107 is located immediately west of the Docking Shoal bathymetric feature, but is not believed to be directly affecting this feature or the associated habitats for which this site is being proposed. Area 481 is located north west of Docking Shoal, and again is not believed to be directly affecting this feature or the associated habitats for which this site is being proposed.</p> <p>Area 107 and 481 could be removed from the proposed dMCZ site by amending the boundaries to better align with the toe of the shoal feature on the basis that neither activity was resulting in a direct or indirect affect on the features for which the site was being proposed – namely the reef and faunal turf habitats.</p> <p>Subject to clarification the site opinion could shift to neutral/positive</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km2 of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Significance of potential pressure on the features of interest in each dMCZ proposal needs to be taken into account – something which is not done through the current compatibility matrices.</p> <p>Option for marine aggregate interests to remain within site boundaries if there was a clear and agreed understanding that they would be subject to test of significance – if it could be demonstrated that the activity was not having a significant effect on the features for which the site was being proposed then it could continue.</p>
-----	---	--	--	--	---

2.7	x			<p>Boundaries of the dMCZ have been amended to exclude existing and proposed marine aggregate interests, although areas do lie immediately adjacent to the boundaries. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>
2.8	x			<p>Boundaries of the dMCZ have been amended to exclude existing and proposed marine aggregate interests, although areas lie immediately adjacent to site boundaries. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>

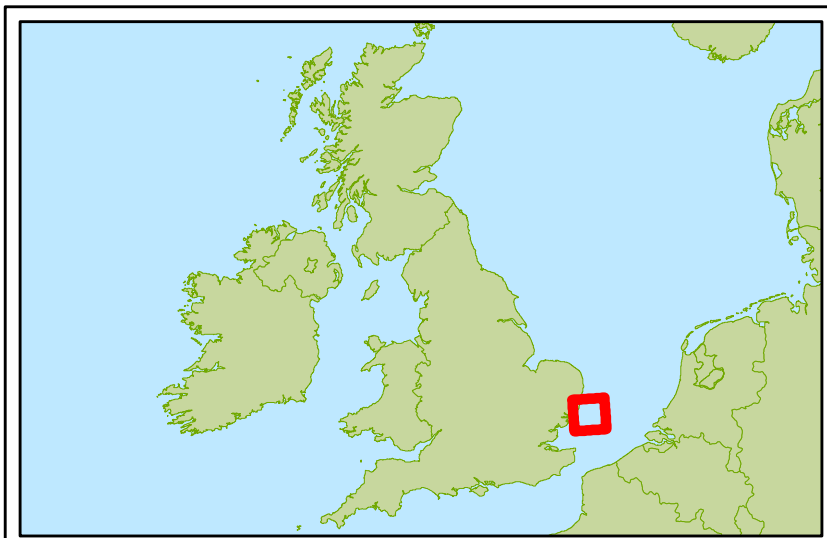
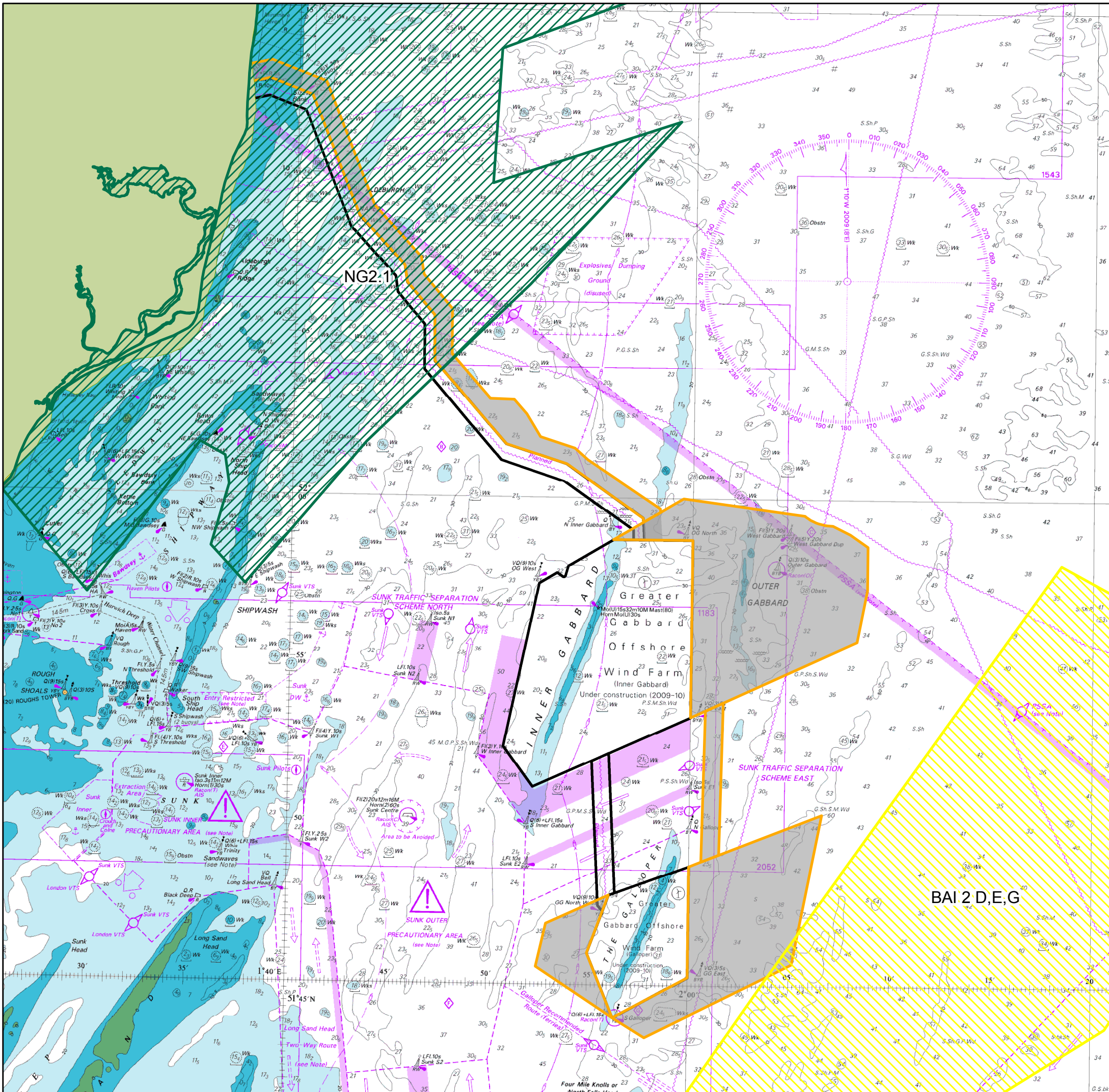
2.9	x		<p>Boundaries of the dMCZ have been amended to exclude existing and proposed marine aggregate interests, although areas lie immediately adjacent to site boundaries. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>
2.10	x		<p>Boundaries of the dMCZ contain no existing and proposed marine aggregate interests, although some lie immediately to the south. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1).</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>





2.11	x			<p>Boundaries of the dMCZ contain no existing and proposed marine aggregate interests, although some lie immediately to the west. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1).</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £2.05M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>
2.13	x			<p>Boundaries of the dMCZ contain no existing and proposed marine aggregate interests, although some lie immediately to the south. Consequently there are residual concerns over the implications of potential indirect impacts.</p> <p>Indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1).</p> <p>Subject to clarification of indirect effect implications, the site opinion could shift to neutral/positive.</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675M per km<sup>2</sup> of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established. It may be necessary to modify dMCZ boundaries with buffers to account for this.</p>

2.17	x		<p>At present the site proposal could have a direct impact on marine aggregate interests. Without clarity on the implications of this it is scored negative.</p> <p>Boundaries of the dMCZ should be amended to exclude existing and proposed marine aggregate interests on the basis that they represent a small fraction of the overall habitat area and that alternatives areas of similar habitat type are available if further area required to meet ENG targets – though we note that the sand/ mixed/ coarse habitats are already above maximum targets.</p> <p>Direct &amp; indirect impact footprints to be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1)</p> <p>Subject to clarification the opinion of the site could shift to neutral/positive</p>	<p>Potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £6.4M per km2 of licence/option area restricted.</p> <p>Requirement for replacement resources elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p>	<p>Significance of potential pressure on the features of interest in each dMCZ proposal needs to be taken into account – something which is not done through the current compatibility matrices.</p> <p>Option for marine aggregate interests to remain within site boundaries if there was a clear and agreed understanding that they would be subject to test of significance – if it could be demonstrated that the activity was not having a significant effect on the features for which the site was being proposed then it could continue.</p>

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)  
or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG





-  Draft Marine Conservation Zone (dMCZ)
-  Broad Area of Interest (BAI)
-  Galloper Wind Farm
-  Greater Gabbard FEPA License Area

© British Crown and SeaZone Solutions Limited. All rights reserved.  
Products Licence No. 102009.001.

dMCZ and BAI received from NetGain.

The concepts and information contained in this document are the copyright of SSE Renewables (UK) Ltd. Use or copying of the document in whole or in part without the written permission of SSE Renewables (UK) Ltd constitutes an infringement of copyright. SSE Renewables (UK) does not warrant that this document is definitive nor free of error and does not accept liability for any loss caused or arising from reliance upon information provided herein. Not to be used for navigation purposes.



<b>UK Offshore Development</b>		
<b>Figure 1</b>		
<b>Greater Gabbard Offshore Wind Farm and Galloper Wind Farm with Marine Conservation Zones</b>		
Drawing Number: GWF 240 R1	Rev: 1	
Date: 12/11/10	Created: DP	Checked: KT
Scale: 1:220,000	Page: A3	
Datum: WGS1984	Projection: UTM Zone 31N	





## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

Name Douglas Parrant .....

Sector represented **SSE Renewables – Offshore Wind Farm Development** .....

Regional Hub **East of England** .....

### SSE Renewables comments

SSE Renewables (SSER) has been working in the area around the Inner Gabbard, Outer Gabbard, and Galloper sandbanks since 2002. Over this period (SSER) have been undertaking an extensive array of surveys and collecting data that has probably has not been previously obtained. As a result of this we have an in-depth knowledge of the area and a wealth of data.

Feedback was collected through extensive surveys and data collection since 2002. Discussions have also occurred with environmental advisors, RWE npower renewables, The Crown Estate and Renewables UK. We have also over the course of the past 8 years consulted with Government agencies and sea users in the area extensively.

Having participated in all the NetGain meetings to date it is unfortunate to see that SSE Renewables input into these meetings seems to have not been fully taken into account. During the last East of England meeting the proposed BAI which is an amalgamation of 2 D,E,G was accepted with the proviso that the revised BAI would be stripped down to follow the edge of 2F and thus avoid the round 2.5 wind farm. It appears that the report provided to the SAP hasn't taken this amendment into consideration and the BAI 2DEG now is collocated within an area of Galloper Wind Farm.

The standpoint of SSE Renewables is that cabling is not an incompatible activity within an MCZ as suggested by the sensitivity matrix for most BSH and FOCI, however this information has not been made explicit or available. There would therefore be a less negative response for site NG2.1 if there were more clarity on the level of restrictions that maybe applied to cabling activity that will be imposed in order for the BSHs/FOCI to be protected.

An additional concern is at what stage will reference sites be identified? How will this be done and will there be an opportunity for stakeholder input prior to formal consultation on these?

The EUNIS Level 3 Broad Scale Habitat data being used to identify the nominal square km ENG targets and define boundaries is highly inaccurate which leads to low confidence in the justification for the boundary locations and subsequent conservation objectives and management measures.

Most of the FOCI identified for protection in different MCZs are widespread but are only identified on maps due to presence of survey data in those areas. Considering the inadequacies of the data, how much importance and protection will be afforded to the FOCI within each MCZ? The low quality of data raises issues regarding the justification for designating these zones.

The overlap between regional hub boundaries makes for undemocratic resolution of boundaries by StAP as some areas are being double-counted/proposed due to hub overlap.



Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.1	X			Request for clarity on level of restriction of cabling activity that will be imposed in order for the BSHs/FOCI to be protected.	Greater Gabbard Offshore Wind Farm already has cables laid through this zone and it needs to be clear that there will be no restrictions to operation / maintenance of the cables.  Additional cables will also be required for Round 2.5 Galloper Wind Farm site.  This zone is likely to have significant economic impacts for round 2, 2.5 and 3 Wind Farms.	Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required
<b>BAI 2_D,E,G over Galloper Round 2.5 Site (EE Hub)</b>	X			During the meeting on the 12 <sup>th</sup> & 13 <sup>th</sup> November it was discussed that the BAI in question would be trimmed to avoid Galloper Wind Farm and continue straight down from 2_F.  Rather than what was submitted to the SAP which does not have the same line as 2_F.  Applying these changes removes all expected impacts stated opposite and SSER are likely to change opinion to positive.	Overlays the south-easterly section of the <b>SSE Renewables/RWE npower renewables Round 2.5 Galloper Wind Farm Site</b> (area furthest from land) which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:  Investment for Greater Gabbard was around £1.3 billion, therefore it is likely that Galloper Wind Farm will be in excess of this after inflation  530,000 households powered by renewables energy *  Around 100 jobs were created in Lowestoft for Greater Gabbard and it is therefore anticipated that there would be a similar number for Galloper Wind Farm  <i>*based on site specific data indicating a load factor of approximately 40% and using the average annual UK household consumption of 3.3MWhrs.</i>	This proposed area is designated due to the prevalence of sand and coarse sediments, these designated sites make up a vast amount of the southern north sea and provide the opportunity for alternative locations.  Low confidence in the quality of the underlying data raises issues regarding the justification for designating these zones.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



Dear Joanna,

Please find enclosed The Wildlife Trusts response to the request for feedback regarding the 'Net Gain - Progress Report for the 2<sup>nd</sup> iteration – Submission to the Science Advisory Panel, October 2010'.

As always The Wildlife Trusts welcome the opportunity to provide feedback to the project and hope the comments given can be taken in the constructive manner in which they are intended. In future a longer deadline for feedback would be appreciated if possible. Please see attached document for site specific feedback.

### Concerns regarding the submission presented to the SAP

It is apparent the second iteration submission submitted to the SAP was produced on a rapid timescale and as a result is littered with mistakes and misinterpretations. These in places render the submission an inaccurate reflection of the outputs of the hub meetings. Examples of this include:

- Page 66 reference is made to the oil and gas sector at the Yorkshire and Humber hub:  
*'The oil and gas renewable energy sectors were happy with the site (NG2.18) as proposed'* my understanding was that no oil and gas representatives were available to comment at the Yorkshire and Humber meeting. The Yorkshire and Humber hub report participant list also fails to identify a representative from this sector present during this meeting.
- Plenary during the Yorkshire and Humber hub identified the established No Take Zone (NTZ) at Flamborough Headland as a potential 'reference' area. The decision was made collectively during plenary not to submit the existing NTZ site formally as a dMCZ but that it would be referenced as an area for future discussion within the SAP submission. The omission of this reference from the submission document and from the local Yorkshire and Humber hub report is a crucial omission and will result in a repeated discussion occurring at the next round of hub meetings.

These are just two examples of inaccuracies within the SAP submission document. In future this document must accurately represent the discussions and outcomes presented from the hub meetings; otherwise it is rendered an inaccurate reflection of the projects outcomes and will delay future progress.

### Sign off of the submission

In this instance the deadline for the submission to the SAP was incredibly tight, resulting in the Net Gain team submitting the 2<sup>nd</sup> iteration without sign off from the StAP. During the StAP meeting on the 18<sup>th</sup> August discussions were held regarding how best to conduct sign off of the submission. StAP members discussed the potential of an electronic sign off. In the event that an electronic submission was not possible Net Gain were to caveat the 2<sup>nd</sup> iteration submission document to explain Net Gain were acting as administrators to this document. The minutes from the August StAP meeting do not fully record this discussion:

*Comment Concerns raised over how sites would be reconciled and that StAP would not have the sign off.*

Again this reiterates the need to accurately record the outputs of meetings and puts Net Gain in an administrative role over the MCZ process, submissions should be signed off by the stakeholder groups, in the case of Net Gain the StAP.

I recommend in future StAP members are given the opportunity to comment on the submission document prior to submission to ensure the document is an accurate reflection of the hub outputs. It is also worth noting that the StAP and hub members did not receive the submission until Wednesday 3<sup>rd</sup> November, we are however aware that the document was already in circulation with other stakeholders. All stakeholders within the MCZ process have an 'equal' stake in the process and should therefore be treated as such.

### Key concerns regarding the identification of MCZs

Sites need to be identified using the ecological evidence available. Disappointingly we are still yet to see the full representation of ecological data available at Net Gain hub meetings and so continue to see dMCZs identified primarily to avoid socioeconomic interests.

We are aware of delays to Net Gain in receiving national data sets and commend the Net Gain MCZ planner and data officers on the efforts they are making to digitise data. However due to the large number of socioeconomic representatives at meetings, poor facilitation and poor ecological data presented dMCZs continue to be identified based on poor ecological grounds. This is particularly disappointing as the data is available in which to make sound ecological decisions.

As a result of the lacking ecological evidence available during the October hub meetings not all dMCZs identified were based on ecological merit and plenary sessions focused heavily on attempting to identify ecological grounds for dMCZs identified. Ecological importance of dMCZs must be a priority during planning and should be the message iterated to stakeholders during hub meetings by the Net Gain team.

Following from this, section 5 of the submission document states:

*'In addition to extracting the ecological information for the network, the project team have also completed a rapid assessment of the activities present across the network of dMCZs (Table 5). At this stage, we have not fully assessed which of these activities may or may not be compatible with the dMCZ features, and therefore what conditions the sites is likely to be in as we are awaiting guidance on conservation objectives. Looking ahead this table can be used as a basis for discussions in the 3<sup>rd</sup> iteration to ensure that we are taking account of socioeconomic interests as described in the Marine and Coastal Access Act, 2009'.*

We continue to express concern regarding the manner in which dMCZs are being identified and by statements such as the above. See below the direct reference taken from the Marine and Coastal Access Act highlighting the manner in which socioeconomic should be considered when identifying Marine Conservation Zones:

#### *Designation of zones - 117 Grounds for designation of MCZs*

*(7) In considering whether it is desirable to designate an area as an MCZ, the appropriate authority **may** have regard to any economic or social consequences of doing so.*

Please note the use of '**may** have regard'. Socio-economic considerations are not the key identifying factor for MCZs and should not be used as such.

### Key concerns regarding presentation of ecological data

In future, as well as using additional ecological evidence to identify dMCZs it is also important to accurately record all ecological evidence available that contributes to the identification of the dMCZ. The use of tables within the submission document was helpful to highlight the identifying features of each dMCZ.

These additional considerations were thought to apply to the site:

Geology & geomorphology								
Seabirds	✓							
Mammals	✓							
Fish spawning, etc	✓							
High biodiversity	✓							
High productivity								
Additional importance								
No degradation								
Scientific value	✓							

However at this stage, these tables do not provide enough detail for each dMCZ and in cases the information presented is misleading, for example the Holderness coast (dMCZ NG2.12) is an extremely ecologically diverse site, however no additional considerations are recorded for this site, i.e. the table remains blank. It is likely that this was a result of the key data sets demonstrating the ecological value of this site being absent from the Yorkshire and Humber hub meeting. We strongly recommend as the process moves forward that ecological profiles are constructed for each potential dMCZ. Within section 6; 'Looking Ahead' I note your comments;

*'Taking on board the SAP advice to develop portfolios of sites under consideration work has already begun with project partners and NGOs to supplement the evidence currently available for dMCZs'*

I feel this would be a useful contribution to meetings and The Wildlife Trusts are happy to offer assistance to support this where possible.

Further issues regarding data presentation

Following the SAPs advice, given after the first iteration dMCZs were identified within both the Yorkshire and Humber and North Eastern hub based on existing SFC closures, e.g.no trawl zones. Maps were available during planning meetings that referred to the locations of existing SFC restrictions. However, these provided little detail as to what these areas referred to. To allow maximum usage by stakeholders in meetings details are required regarding these existing restrictions, e.g. no trawl areas, partial closures, closures to specific gear type.

In future, further information is also required from the gap analysis, for example details regarding dSACs such as the Dogger Bank, to ensure their inclusion within ENG targets.

**Key concerns regarding identification of conservation objectives**

Proformas to record conservation objectives

Use of proformas during hub meetings was helpful and significantly aided progress of groups. However proformas labelled sites as 'favourable' or 'reference' in terms of their purpose for designation. Labelling sites as 'favourable' may be misconstrued by stakeholders to mean a dMCZ identified is currently considered to be in 'favourable' condition, which may lead to confusion regarding the purpose of creating conservation objectives for this site.

Use of support software to aid identification of conservation objectives

The PRISM/PISA tool was a useful addition to hub meetings and provided guidance regarding compatibility of activities with ENG features. It provided an initial starting point for the identification of conservation objectives however this tool does only provide an initial starting point for discussions and fails to consider the intensity at which particular activities are occurring. In cases it will be the intensity at which an activity occurs that will directly affect the conservation

objectives required for each dMCZ. See below comments from a well informed member of the Yorkshire hub group highlighting the need for conservation objectives to receive careful consideration;

*“The shrimp boats are light weight beam trawlers and the NESFC said that they are low impact. However, they are still beam trawlers, which means they will have tickler chains etc to disturb the ground, so it is effectively lightly ploughed. In view there can be up to half a dozen vessels within a couple of miles out.*

*They use such fine mesh nets to catch the brown shrimp, Crangon crangon, so they would drag up all the immature fish etc as well.*

*Some of the vessel numbers are registered from Peterhead and Fraserborough. It is suggested that they tend to be local resident vessels out of the Wash, but registered elsewhere to maximise quota allocations around the coast. Apparently, the shrimp fishing is improving along our coast now, which is why there are more boats, but it is also considered as a back-stop if things go wrong in the Wash.”*

Future hub meetings need to make this factor evident to ensure stakeholders do not misinterpret compatibility of activities with dMCZ ecological features, for example;

*Page 57 ‘It was agreed that the site should be taken forward with the caveat that activities that currently take place there would be allowed to continue’.*

We are concerned by references such as this, an MCZ in which no restrictions result makes little difference to the current condition of the habitat identified for protection.

## Feedback

In general we found the October hubs were conducted in a professional manner by the Net Gain team and allowed considerable progress to be made by stakeholders; however we continue to experience problems with Net Gain staff facilitating small group work. Difficulties were noted at both the North Eastern hub by Wildlife Trust staff and at the Yorkshire and Humber Hub by MCS representatives. The role of the Net Gain team is to facilitate and not to influence discussions; we have flagged this up on prior occasions and feel this needs to be reiterated again to members of the Net Gain team.

Please note I have also emailed Steve Barnard since the last round of hub meetings and offered to be involved with the impact assessment sub group; please keep me posted with the progression of this group.

Yours sincerely,



Kirsten Smith  
North Sea Marine Advocacy Manager

On behalf of:

Steve Lowe – Northumberland Wildlife Trust (North East hub)

Paul Learoyd – Lincolnshire Wildlife Trust (Lincolnshire hub)

John Hiskett – Norfolk Wildlife Trust (East of England hub)

cc'd:

Joan Edwards – TWT Head of Living Seas

Richard White – TWT MPA Manager

Jolyon Chesworth – TWT South East Marine Conservation Manager (member of Balanced Seas RSG)

Martin Kerby (RSPB)

Jean-Luc Solandt (MCS)



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name	<b>Kirsten Smith</b>
Sector represented	<b>The Wildlife Trusts – NGO</b>
Regional Hub	<b>Feedback covers all four hub areas – see attached letter addressed to Joanna Redhead for further general feedback</b>

Please explain briefly how the feedback you are presenting was collected:

### Internal liaison within The Wildlife Trusts

Please indicate how many people you have been able to discuss this feedback with:

**20 – four local hub representatives, members of our national team, a WT representative acting within the Balanced Seas project, Other WT MPA staff and local WT conservation, planning and coastal reserve staff.**

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

- **Increased feedback deadline – tight deadlines reduce the potential of obtaining maximum feedback**
- **Ecological data – available for download from the FTP site**
- **A composite data layer comprising of ecological data – including the broadscale habitats, FOCI and additional ecologically important data, e.g. spawning data, seabird foraging radii, seasearch dive data, cetacean, frontal data etc.**

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.1			✓	Boundary should be extended northward to include Grey Seal colony and little tern breeding/foraging at Winterton. Grey seal protection is important for tidal/beach area due to disturbance from beach users occurs.	<ul style="list-style-type: none"> <li>• Potential for improved biodiversity</li> <li>• Potential for improved management of marine environment</li> <li>• Potential of wider public benefits from a well managed marine environment</li> <li>• Potential for all of the above to result in increased economic potential from marine nature based tourism e.g. guided walks, boat trips etc as well as wider public benefits.</li> </ul>	This could be a small extra MCZ to specifically include these features rather than an addition to NG2.1. It would then represent a small offshore extension to Winterton NNR.
NG 2.2			✓	Excellent examples of subtidal chalk and should be considered for reference status		
NG 2.3			✓	Cross over of boundaries - possibility of merging together?		
NG 2.4			✓			
NG 2.5			✓			
NG 2.6			✓			
NG 2.7			✓			
NG 2.8			✓			
NG 2.9			✓			
NG 2.10			✓			
NG 2.11			✓			
NG 2.12			✓	Existing SFC no trawl zone – sensible to cover areas with existing management mechanisms		
NG 2.13			✓			



NG 2.14			✓			
NG 2.15			✓			
NG 2.16		✓			Unlikely the area is circalittoral rock, for which the dMCZ was identified. Further data is required to confirm the broadscale habitat here.	
NG 2.17			✓		These sites could be combined.	
NG 2.18			✓		Area of high primary productivity – a reference area should be considered within these sites.	
NG 2.19			✓			
NG 2.20			✓			
NG 2.21			✓			
NG 2.22			✓		Splitting this area into smaller dMCZs may be required to meet replication criteria within the ENG. A proportion of this dMCZ should be considered as a reference area for this habitat type.	

**Unfortunately at this stage we are unable to offer further comment regarding individual sites – see attached document for further feedback regarding identification of dMCZs and conservation objectives.**

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)  
or to:

Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



**Feedback following second iteration (dMCZ) submission to SAP – October/November 2010**

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                    Les Weller .....

Sector represented    RSA, Amble Sea Angling Club .....

Regional Hub            NE .....

Please explain briefly how the feedback you are presenting was collected:    Personal meetings and discussion and various local RSA forums .

.....

.....

.....

Please indicate how many people you have been able to discuss this feedback with: About 15 personally have not counted the forum hits but have had several replies

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

.....

As stated before an open meeting with RSA in Northumberland .....



The Deep Business Centre, Tower Street  
Hull, HU1 4BG

4<sup>th</sup> Floor  
1 Atlantic Quay  
Glasgow G2 8JB  
10<sup>th</sup> November 2010

Trevor Jameson  
Chairman, Stakeholder Advisory Panel  
Net Gain  
The Deep Business Centre  
Hull  
HU1 4BG

By email to [trevor.jameson@tjas.caroo.co.uk](mailto:trevor.jameson@tjas.caroo.co.uk)

Cc: [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk); [joanna@yhsg.co.uk](mailto:joanna@yhsg.co.uk); [enock@yhsg.co.uk](mailto:enock@yhsg.co.uk); [chiara@yhsg.co.uk](mailto:chiara@yhsg.co.uk);  
[james.marsden@naturalengland.org.uk](mailto:james.marsden@naturalengland.org.uk); [victoria.copley@naturalengland.org.uk](mailto:victoria.copley@naturalengland.org.uk);  
[jamie.davies@naturalengland.org.uk](mailto:jamie.davies@naturalengland.org.uk); [emma.harding@decc.gso.gov.uk](mailto:emma.harding@decc.gso.gov.uk);  
[eddie.routledge@defra.gsi.gov.uk](mailto:eddie.routledge@defra.gsi.gov.uk); [claire.herdman@defra.gsi.gov.uk](mailto:claire.herdman@defra.gsi.gov.uk)

Dear Mr Jameson

## NET GAIN EAST OF ENGLAND HUB 2ND ITERATION PROPOSALS

ScottishPower Renewables (SPR) is an energy company with a remit for developing and operating renewables assets and supplying electricity to our customers, and has an ambitious future programme of offshore wind, wave and tidal developments in the UK.

Vattenfall Wind Power Limited's (VWPL) ultimate holding company is Vattenfall AB, a state owned Swedish utility which currently operates 570 MW of offshore wind capacity around Europe and has a pipeline of 4,800 MW of offshore wind capacity at various stages of development.

SPR and VWPL are jointly developing the Round 3 East Anglia zone off the east coast of England which has the potential to provide up to 7,200 MW of wind capacity.

SPR and VWPL recognise the need for, and welcome the development of, a well managed and ecologically coherent network of Marine Protected Areas. Careful management of the seas is essential to developing a responsible and sustainable approach to producing clean, green energy to meet the UK's legally binding renewables targets and ambitions for climate change emissions reductions by 2020. As responsible operators, we have therefore engaged constructively with the Marine Conservation Zone (MCZ) process to date, including representation by SPR on the East of England hub of the Net Gain project, where we have a specific interest in relation to the development of multiple projects within the Round 3 Zone 5 (East Anglia zone).

Fundamental to the investment in and delivery of any high value project is a well understood, stable regulatory environment which provides the required level of confidence within which such investments can be justified and approved. A lack of clarity in terms of the regulatory environment, or other areas of potential uncertainty, only act to increase this risk, rendering investment decisions more difficult or in the worst case undermining them completely. A key concern is the effect of uncertainty and delay on the planning and development stages of a project such as this- in addition to the very significant economic impacts, delays would cost



the UK an estimated 10 million tonnes of CO<sub>2</sub> per annum which would otherwise be displaced.

It is therefore important that we raise with you some serious concerns about the 'Broad Areas of Interest' (BAI) proposals that resulted from the recent second iteration process in Net Gain's East of England hub on the 12th and 13th October 2010 in Lowestoft. We would welcome your thoughts and assistance in addressing these concerns. We have copied this letter to other key MCZ contacts, as listed above, in order to highlight to them the importance of this issue. We would also be grateful if this letter could be circulated to the members of the Stakeholder Advisory Panel, prior to their next meeting on the 18<sup>th</sup> November.

In essence, there are two major habitat types (subtidal sand and subtidal coarse sediment) that are widely distributed throughout the Net Gain area. Three BAIs were selected on the basis that they contained a mosaic of these two habitat types, and have been put forward by the East of England hub. In order to meet the required habitat area it is likely that some part of these three areas will be identified as a potential MCZ.

The locations of these BAIs are as follows (map attached at annex 1):

1. Partial overlap with Outer Thames SPA and East Anglia Offshore Windfarm (EAOW) development
2. Fully co-located within the EAOW development zone
3. Situated along the eastern boundary of the Net Gain zone, in an area where there would be no co-location with wind farm developments.

In terms of the relative ecological importance of these areas, we are not aware of any robust scientific evidence that distinguishes sites 2 and 3 from each other, and therefore they should be treated as being of equivalent ecological importance.

Our concern is that the process which selected the second of these BAIs does not adequately consider the socio-economic impacts of selection, and is therefore not supported by the principles of published guidance from JNCC and Natural England. The socio-economic impacts of selecting an area for a potential MCZ within the EAOW development are significant, not least because of the impacts of an uncertain regulatory framework on investment, and potential delays in the planning and development processes. As other ecologically equivalent areas are available immediately outside the development boundary, then in line with the spirit of the primary legislation and published guidance<sup>1</sup>, these would represent a more suitable selection. **SPR and VWPL would therefore strongly suggest that the second BAI should be removed and not taken forward for further consideration. We would also suggest that further thought should be given to the socio-economic impacts of selecting an MCZ in the first of these BAIs, which we believe would also be significant.**

We recognise that the MCZ process is challenging, not least in terms of data issues, such as the assumed confidences in, and possible over-interpretation of, the Marxan model outputs

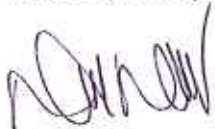
---

<sup>1</sup> For example, the Marine and Coastal Access Act and the MCZ Project Delivery Guidance outline the key point "Where there is a choice of alternative areas which are equally suitable on ecological grounds, socio-economic factors could be more significant in deciding which areas may be designated as an MCZ", and a Ministerial Statement on the Creation of a Network of Marine Protected Areas (11<sup>th</sup> March 2010) states "In ensuring we create an ecologically coherent network, the Government wants to minimise any adverse social and economic impacts and wherever possible to work with the grain of sustainable economic use of the seas".

and the compatibility matrices. We are, however, keen to remain engaged with the process and believe it is in the interests of all to identify the most justifiable MCZs, that fully balance the environmental, social and economic pillars of sustainable development. There are clearly wide choices about where MCZs can be located whilst still meeting the ecological criteria. On this basis, we strongly recommend that the third BAI, on the eastern boundary of the Net Gain area, is the most appropriate of the three to be taken forward for any future consideration and the other two should be removed completely and not considered.

We look forward to hearing from you, and would be happy to discuss any of this further, or to provide further information, in the meantime. Please contact Mandy Gloyer, Policy Manager, Scottish Power Renewables, on 0141 568 2158 or [mandy.gloyer@scottishpower.com](mailto:mandy.gloyer@scottishpower.com) with any queries in the first instance.

Yours sincerely,



David Walker  
Offshore Development Director, ScottishPower Renewables



pp David Hodkinson,  
Director, Head of Development UK, Vattenfall Wind Power Limited

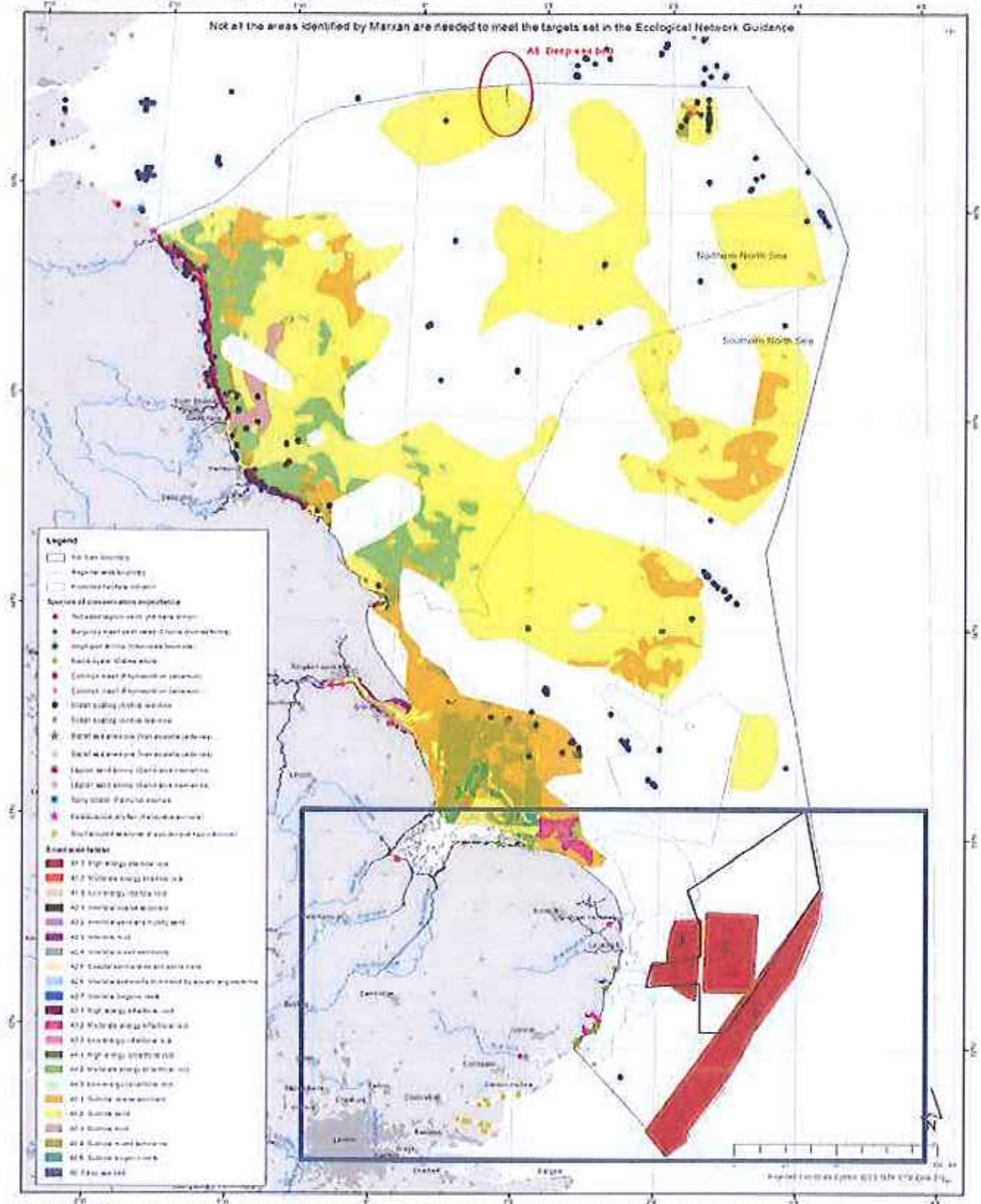




### Marxan areas: Broad Scale Habitats and Species FOCI

The broad scale Marxan areas highlighted on this map were identified by the Marxan software through an analysis of the existing Broad Scale FOCI records. Marxan was run using Broad Scale weights @ 100, Species @ 20 and Habitat @ 10. The map defines many of the boundaries of Broad Scale areas as identified in existing Marine Protected Areas.

Not all the areas identified by Marxan are needed to meet the targets set in the Ecological Network Guidance



Copyright 2012, netgain (2012) and Scottish Natural Heritage. All rights reserved. This map is a reproduction of the map created by netgain (2012) and Scottish Natural Heritage. It is not to be used without the prior written permission of netgain (2012) and Scottish Natural Heritage. The map is a reproduction of the map created by netgain (2012) and Scottish Natural Heritage. It is not to be used without the prior written permission of netgain (2012) and Scottish Natural Heritage.



Type of pressure (from JNCC/NE draft Ecological Network Guidance Annex 7)		Examples (from ENG Annex 7)		Notes
Physical pressures	Physical loss	Removal or loss	Aggregate dredging, isolated rock dump, infrastructure development	Considered permanent loss of habitat. Habitat removal or loss can have an indirect effect on seabirds e.g. effects of aggregate dredging on sandbanks, affecting sandeels and in turn seabirds. This does not just apply to sandy habitats/sandeels - removal/loss of other habitats could also be an issue especially where species are more restricted in their distributions and so dependent on particular sites and communities for feeding opportunities.
		Smothering	Drill cuttings, beach replenishment, sediment deposition post-dredging	Considered permanent loss of habitat. Smothering could also have an indirect effect on seabirds via effects on prey species. E.g. smothering of shellfish beds could have indirect adverse effects on shellfish-eating species.
	Physical damage	Changes in suspended sediment	Screening plumes from aggregate dredging	Considered temporary loss of habitat, i.e. recovery is possible (but over what timeframe?). Effects on turbidity due to changes in suspended sediment could affect birds (e.g. diving birds pursuing prey underwater) but this can be dealt with under "changes in turbidity" [Non-toxic contamination]
		Physical abrasion	Mobile and static benthic fishing, anchoring, wind farm scour pits, pipeline burial	Considered temporary loss of habitat, i.e. recovery is possible (but over what timeframe?). Physical abrasion e.g. due to fishing practices could adversely affect seabirds e.g. loss of feeding opportunities due to destruction of or extensive damage to shellfish beds would negatively affect shellfish-eating birds.
	Other physical disturbance	Obstruction (passive) to movement	Sandbank migration, species migration	Birds can be affected either if developments e.g. renewable energy developments act as barriers to their migration (barrier effect), or if their access to feeding grounds is restricted (displacement effects).
		Collision (active)	Cetaceans being struck by vessels, birds being struck by wind turbines	It would be useful for seabirds to consider above-water collision (e.g. with wind farms) and below-water collision (e.g. with tidal stream developments) separately. The likelihood of collisions below the surface will depend on the dive depth of different seabird species as well as the depth of the structure.
		Hydrological changes (local)		No direct/indirect effects on seabirds known.
		Noise	Boat activity, seismic	Little is known about the possible direct effects of underwater noise on seabirds e.g. diving seabirds. Noise (including vibration) e.g. pile driving does have a well-documented effect on prey fish species which in turn can affect seabirds.
		Visual presence	Recreational activity	Visual disturbance can be important for some birds, especially at sensitive periods e.g. moulting. This category should include maintenance activity around offshore installations as well as recreational activity.
		Introduction of litter	Plastic containers	The introduction of litter does affect seabirds e.g. through entanglement, or ingestion of litter. However, dumping of litter at sea is already an illegal activity, and it is hard to see how it can be controlled effectively at the level of an individual MCZ to manage the risk to seabirds. Therefore we have not scored seabird species against this pressure - our recommendation would be for the introduction of litter to be unacceptable in any MCZ. The examples given in the Guidance should include discarded fishing nets and microplastics as well as plastic containers.
	Electromagnetic disturbance	Submarine cables	This will affect some fish species, including prey species for seabirds, but it is hard to extrapolate from this to effects on seabirds, so we have not scored against this pressure	
Chemical pressures	Toxic contamination	Introduction of synthetic compounds	TBT, PCBs, industrial chemical discharge, produced water, fuel oils	In terms of threats to seabirds, introduction of synthetic and non-synthetic compounds should be combined to give an overarching category of Toxic contamination. NB that this can be due to either introduction of toxic substances to the environment, or release of toxic substances from the environment e.g. dredging releasing hazardous substances/toxic substances previously trapped in sediments. There are direct threats to seabirds e.g. through oil spills and ingestion of toxic chemicals etc., but there could also be indirect threats through bioaccumulation of toxins through the foodchain.
		Introduction of non-synthetic compounds	Heavy metals, crude oil spills	See note above.
		Introduction of radionuclides	Nuclear energy industry	We do not have enough information to score species sensitivity to this pressure in particular, but it can be included in the overarching category of Toxic contamination. Considered separately, it would be scored as 'D' - data deficient for all seabirds.
	Non-toxic contamination	Changes in nutrient loading - nitrogen and phosphorus enrichment	Fertilizer runoff	These are diffuse sources of nutrient loading/pollution. Effects for seabirds can include indirect effects from toxic algal blooms rendering fish and shellfish poisonous to seabirds, causing death or temporary paralysis at sublethal doses.
Changes in nutrient loading - organic enrichment		Sewage, fisheries discards	These are point sources of nutrient loading/pollution. See comments above. We have not considered the effects of discarding unwanted fish and offal on seabirds in this analysis. We acknowledge that such fisheries waste can have significant population-level (positive) effects on certain species of seabird, but this is not something we think should be taken into account when setting management measures for an MCZ. Management of fisheries waste is an issue for fisheries management - and we would not advocate keeping discharges artificially high to provide extra food for seabirds. The examples given in the Guidance could usefully include waste from fishfarms.	
	Changes in thermal regime	Cooling water discharges	No direct/indirect negative effects on seabirds known although outlet areas can suffer changes in biodiversity, including potentially harmful invasive species.	
	Changes in turbidity	Laying of pipelines, aggregate dredging	Changes in turbidity may affect diving birds in pursuit of prey underwater, as well as species that rely on visual location of prey from or above the surface.	
	Changes in salinity	Outfalls from rigs, ships	We have not scored species for sensitivity against this pressure. There is potential for future threats from flushing out under seafloor salt caverns for CCS - this has the potential for very significant effects on the marine environment in general (significant, localised increases in salinity). This should be captured by individual development IAs though and so has not been included in this analysis.	
Biological pressures	Biological disturbance	(Direct) deoxygenation	Ballast water and power plant outflows	No direct/indirect effects on seabirds known.
		Introduction of microbial pathogens	Outfalls	No direct/indirect effects on seabirds known.
		Introduction of non-native species and translocation	Ballast water, hull fouling	No direct/indirect effects on seabirds known.

		Selective extraction of species	Bioprospecting, scientific research, fishing (target and non-target catch)	The examples given in the Guidance cover both selective and non-selective extraction of species, as bycatch. In terms of effects on seabirds, extraction should be split into two distinct categories of pressure - the indirect effects on the food chain of fishing/overfishing (prey competition); and the direct mortality inflicted by seabird bycatch. Consideration of fisheries effects must also cover shellfisheries.
		Genetic changes	GM modified and/or genetically different salmon from aquaculture	No direct/indirect effects on seabirds known.
		<i>**Geomorphological changes need to be added to complete this list (though could be considered as partly covered by 'Smothering' and 'Physical abrasion')</i>	<i>Wind farm scour pits</i>	<i>Geomorphological effects are contained in part by some of the categories above but should really be considered separately. They can sometimes be positive e.g. formation of new sandbanks as a result of developments in one area can be beneficial. We have not created a separate category for the purposes of this exercise, but have included this comment in our response to the draft JNCC/NE Ecological Network Guidance.</i>



**a million  
voices for  
nature**

RSPB Northern England  
1 Sirius House  
Amethyst Road  
Newcastle Business Park  
Newcastle upon Tyne  
Tyne and Wear  
NE4 7YI.

Mr Steve Barnard  
Stakeholder Manager  
Net Gain: The North Sea Marine Conservation Zone Project  
The Deep Business Centre  
Hull, HU1 4BG

By e-mail: [steve@yhsg.co.uk](mailto:steve@yhsg.co.uk)

15 November 2010

Dear Steve

**RSPB feedback on 2<sup>nd</sup> iteration submission to the Science Advisory Panel and 3<sup>rd</sup> round of regional hub meetings**

Thank you for the opportunity to provide feedback on the second iteration of Marine Conservation Zones (MCZs) within the Net Gain area. The RSPB is pleased to provide our comments on the sites selected in October. These can be found in Annex 1 of this letter.

In addition, we would also like to make the following comments, which we hope will be useful in preparing for the next round of regional hub meetings:

**1. Ensuring the MPA network protects the most ecologically valuable sites**

The RSPB is encouraged by the progress made at the October hub meetings, and supports the increased emphasis on ecological criteria in the initial sessions and the use made of Marxan. However, whilst the consensus decisions made by the regional hubs have delivered twenty-two dMCZs, we are concerned that these may not include the most biodiverse sites in the North Sea. This is partly because sites are being primarily identified to avoid socio-economic impacts - but also because regional hub members have only been able to refer to a limited set of ecological data.

Therefore, whilst some of the dMCZs selected are promising, Net Gain should be aware that, upon assessing them with respect to a more comprehensive set of ecological data, other MCZs may need significant revision to ensure that areas with higher biodiversity are protected. New sites may well need to be identified to achieve protection of the most valuable areas. It is unclear from the SAP submission whether new dMCZs can be considered at the next regional hub meeting and we would welcome Net Gain's clarification on this matter.

We note that JNCC and the Wildlife Trusts will be providing the regional projects an amalgamation of various ecological datasets. The RSPB recommends that the emerging MCZ network is cross-referenced to this dataset as soon as it becomes available. This will allow the Net Gain team and the regional hubs to determine whether the draft network will adequately protect those areas with high biodiversity, or whether dMCZ boundaries need to be adjusted in order to provide sufficient protection to the most important sites.

More generally, whilst timescales within the hub meetings are tight, it would be valuable to briefly take the regional hub members through the more recent ecological data layers in the regional profile, so that they are aware of what new information is available to aid their decision-making. It would also be beneficial to have some more inspiring material on North Sea wildlife (photographs etc.) available at the next hub meetings, to secure more enthusiasm for and 'ownership' of an ecologically-robust network.

## **2. Inclusion of seabird data within the regional profile**

As noted by the Science Advisory Panel (SAP) in its response to the first iteration, seabird density is a valuable indicator of biological productivity. In the absence of fishing effort data, seabird data will be an important means of determining whether the MCZ network is protecting the most appropriate area. The hard work of the Net Gain data team has already led to the inclusion of seabird information in the regional profile, which we welcome.

The following datasets are particularly important, and we recommend that all three are included in the regional profile to assist the hub's discussions.

- i) *Refined Seabird Foraging Radii Mapping* - the RSPB was pleased to see that the draft seabird foraging radii maps produced by Net Gain were included in the regional profile. We understand that the draft maps are currently being finalised, and look forward to seeing the finalised versions in the updated regional profile.
- ii) *European Seabirds at Sea (ESAS) data* – ESAS data is the major source of information relating to seabird distribution, and will be invaluable in refining the dMCZs and/or identifying new sites. The other regional MCZ projects have successfully mapped this dataset within their regional profile – and we welcome the commitment from your data team to carry out this work in advance of the next hub meeting
- iii) *Data from RSPB Bempton Cliffs seabird tracking work* - we have also provided some summary data on foraging kittiwake and gannet from the globally important seabird colony at RSPB Bempton Cliffs – however this was not presented in the October 2010 regional profile. We would appreciate it if this dataset was mapped in the regional profile for the next hub meeting.

## **3. Biophysical and physical data**

To date there has been limited emphasis placed on identifying potential MCZs with respect to biophysical features e.g. thermal fronts, cold water upwellings, and also topographic features such as banks and troughs. These areas are likely to be of high primary productivity and have higher biodiversity value as a result. We understand that JNCC have provided data regarding frontal systems and also chlorophyll levels to the regional projects. It would be useful to present what biophysical and physical information is available at the next regional hub meetings – and again, to assess the extent of these areas to the emerging network of sites and seek opportunities for greater overlap.

## **4. Uncertainty regarding the 'gap analysis' and its implications for site selection**

RSPB attendees at the regional hub meetings report ongoing confusion regarding the 'gap analysis' of the contribution of existing or proposed marine Natura 2000 sites and how this information should influence site selection. Clearly this is a very complex issue and we recognise Net Gain's efforts to provide guidance to the hubs. Nevertheless, some hub meetings – and indeed groups within hub meetings - have taken different approaches when considering whether or not to identify sites within current SACs and SPAs – including on the assumption that all species/habitats within a given Natura 2000 site are given full protection. This may have led to the most valuable sites being overlooked.

To address this uncertainty at the next round of regional hub meetings, we recommend that the Net Gain team provides a short update on the 'gap analysis' and some succinct guidance on identifying sites within existing SACs and SPAs. We also recommend that stakeholders are given the opportunity to propose new sites within these existing sites.

## **5. Conservation objectives**

Regional hub discussions so far have focussed on delivering the MCZ network whilst minimising socio-economic impacts. In particular, areas of moderate and high fishing activity - and also other socio-economic uses - have largely been avoided when identifying MCZs, potentially at the expense of selecting the most ecologically suitable sites. It is therefore crucial that robust conservation objectives are set for those sites that have been selected, in order to *'ensure that MCZs collectively contribute to the protection and recovery of the marine environment'* (ENG paragraph 4.7.3). Given that areas of high socio-economic activity have been avoided already, there is a clear risk that, if disproportionate efforts are made to further reduce socio-economic impacts, the level of protection provided by MCZs will be ecologically meaningless.

As well as setting robust conservation objectives to deliver favourable/reference conditions for BSH and FOCl, conservation objectives will also need to be put in place provide appropriate protection for other ecological features, such as seabirds. To assist the Net Gain team in identifying relevant conservation objectives, we draw your attention to the seabird sensitivities/pressures matrix that the RSPB has produced, which identifies activities that have the potential to conflict with areas identified for their importance to seabirds (attached).

## **6. Replication – need for a bio-geographic/regional seas approach**

We note Net Gain's response to the SAP's feedback regarding the ENG Replication criteria. The RSPB strongly supports the SAP's advice in paragraph 2.5.2 that if possible, the regional hubs should identify a sufficient number of replicates at the regional sea rather than overall hub level. The northern and southern North Seas exhibit significant differences in the distribution of BSH and FOCl, as well as major topographic and bathymetric differences.

The MCZs selected will not form an ecologically coherent network if the bio-geographic variation between the two regional seas is not adequately taken into account. To address this risk, we recommend that Net Gain follows the SAP's advice in this instance, assesses the current network of sites with respect to their replication at the regional seas scale, and identifies opportunities to make good any shortfalls through modified or new MCZs.

## **7. Reference sites**

The selection of reference sites will clearly be a contentious issue, but one that will be critical to meeting the ENG criteria and delivering an ecologically coherent network. If available in advance of the next hub meetings, we recommend that the national MCZ project guidance on reference sites (or potentially a summary of it) is released to members in advance of the next round. This will allow attendees greater time to familiarise themselves with the guidance and to minimise the potential for misunderstandings during the hub meetings.

## **8. 'Section 7: Key concerns of stakeholders'**

We are surprised that the following concerns are not included in this section of the SAP submission, as they are likely to be shared by a number of environmental stakeholders:

- Sites continue to be identified primarily on the basis of socio-economic rather than ecological criteria, which may lead to the selection of ecologically-substandard sites
- There is a currently a shortage of ecological data within the regional profile on which to base decision-making.

### **9. Inability to comment on the 2<sup>nd</sup> iteration prior to its submission to the SAP**

The RSPB is disappointed not to have the opportunity to comment on the SAP submission in advance of its submission to the SAP. We are also involved with the Balanced Seas regional project, where, although deadlines were tight, stakeholders were able to make comments on the 2<sup>nd</sup> iteration report via their StAP representatives, which were then compiled and submitted to the SAP alongside the report. We recommend that Net Gain adopt this approach for the 3<sup>rd</sup> iteration submission.

I hope these comments make a constructive contribution to the next round of hub meetings. If you would like any clarification please get in touch, I am happy to discuss them in more detail.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MK', written over a horizontal line.

Martin Kerby  
RSPB Conservation Officer for the North East  
0191-233-4309  
[martin.kerby@rspb.org.uk](mailto:martin.kerby@rspb.org.uk)

cc. Michelle Lindsay, Amy Crossley, Mike Jones, Kate Sugar, RSPB; Kirsten Smith, Yorkshire Wildlife Trust; Aisling Lanning, Natural England



## Annex 1: RSPB feedback on dMCZs and BAIs within the 2<sup>nd</sup> iteration

### **1. How feedback was collected (relating to first page of pro-forma)**

Feedback on the first iteration has been collected internally within the RSPB. This has included liaison between Regional Hub members, national marine staff and reserve staff familiar with the area.

### **2. Site-specific feedback on dMCZs and BAIs**

#### ***a. Comments from the East of England Regional Hub***

Comments are provided on the content of the East of England Workshop Report, with comments on specific sites listed beneath this.

Section 8 of the report describes the approach taken to the consensus building session on Day 2, including the use of a league table to prioritise sites. While this approach has merit, given the table was based on information from the proformas - which in some cases were rushed to be fully completed - it will invariably be lacking in information (e.g on FOCI and additional considerations), and influenced by subjective information not directly relevant to the ENG. This was discussed with Net Gain staff after the session; the point was taken on board and reassurance given that the league table itself would not be reproduced in subsequent reports, but referred to 'in a couple of sentences'. It is therefore disappointing that the league table has been included without adequate explanation of this caveat.

- *Sites 1D and 2C (NG2.3)* - we are supportive of this dMCZ given its importance for a high number of FOCI and potential range of BSH, in addition to its importance for breeding and wintering seabirds. These include fulmar, Sandwich, little and common terns, and lesser black-backed, herring and black-headed gulls in the breeding season, as well as wintering sea duck. We also support the inclusion of peat exposures within the boundary, i.e. at Titchwell, as these are not currently protected by the existing designations.

However, the Eastern England Hub report does not include mention of the sites 3A and 3B that were also put forward. These sites effectively extend site 1D northwards out of the Wash. This would provide greater benefits for seabirds by extending the dMCZ into waters that are of importance for the above breeding seabirds, in particular sandwich, little and common terns.

- *Sites 2E, 2D, 2G, 2F (BAI)* - the report states in relation to these sites that "*a boundary is to be drawn around these sites and they will be presented as BAI in the 2nd Iteration for SAP consideration*". However, the boundary of the BAI depicted appears to comprise of only 2F, 2G and a portion of 2E, so excluding 2D and some of 2E. It would appear that, despite these areas being noted in the meeting as of additional ecological importance, they have been excluded in light of the presence of an area of interest for aggregates extraction, which was specifically identified during the discussions (but not minuted). Site 2F was also noted in the discussions as having been drawn directly from the outer boundary of the R3 offshore wind farm zone, to avoid overlap with the zone. These examples clearly demonstrate the effect of incorporating socio-economic factors into the process of identifying MCZs at this stage. There is also no record in the report of the discussions that occurred throughout the session on the need to prioritise sites on the basis of ecological considerations, in accordance with the ENG on this matter.
- *Site 1C (NG2.1)* - we are supportive of this dMCZ, which overlaps and makes some extension to the boundary of the Outer Thames Estuary SPA. This area is of importance for foraging by

seabirds that breed on the coast (including little, common and Sandwich terns and kittiwake), in addition to its importance for wintering seabirds and a number of FOCI. However, the minutes record that an area of the original 1C site was excluded from the boundary as it is an application area for aggregates extraction. As for the above BAI, such omissions at this stage are premature and not in accordance with the need to prioritise ecological considerations.

Further, the RSPB and the Wildlife Trust advised during the discussions that site 1C should be extended northwards up to Sea Palling, to encompass an area of importance for seals, and little tern colonies that do not receive protection on land here, as well as a significant blue mussel bed, as identified by Sea Search East Anglia 2009. It would have been valuable to ensure this area was marked as a BAI at this stage, to ensure that further discussions on the merits of this will take place at the next round of Hubs. This contrasts with the amendments that were apparently readily carried out in the interests of economic considerations.

#### **b. Comments from the Lincolnshire Regional Hub**

Comments are provided on the content of the Lincolnshire Workshop Report, with comments on specific sites listed beneath this.

The trends given in the overview of the first day site selections, section 8, refer to bird interests being discussed. This was not discussed equally at each table, as the report may imply. Reference to the composite bird map on other tables was also sparse.

In the penultimate paragraph of Section 8, Net Gain '*suggested that, during the map work on the first day groups, should consider placing sites within existing MPAs although any such sites should not be considered as contributing to meeting the Adequacy targets provided on the Consensus Form*'. The initial advice given by the Net Gain team was that the Broad Scale Habitats present within the existing MPAs were already counted, to the effect that the majority of the mapping work on each table ignored the existing MPAs. Due to the perceived contribution of the existing MPAs, this largely ruled out the need to map any area for Broad Scale Habitats A2.1 to 2.4 and A5.2 to A5.3. It is not clear what provision will be made in the remaining schedule for further mapping if the final conservation objectives for MPAs in this hub are not able to adequately protect the Broad Scale Habitats.

- *Sites 1B & 2A (NG2.7)* – the mapping excludes the Humber Estuary solely on the grounds that it was not needed to contribute to the BSH targets. It was chosen by Table 1 for the range of FOCI recorded there and included as part of the site 1B boundary. It was left out of the mapping for the day 2 exercise on the understanding that the boundaries were digitised purely to calculate BSH contributions, but that it would be part of the dMCZ for its FOCI interest. There is no explanation as to why the coastal strip north of the Humber (part of 1B) has been excluded from the mapping of NG2.7, which stops south of the Humber. Site 1B was recorded as scoring highly during the evaluation exercise. Also, the northern boundary of 1B was stopped at the suggestion of Joanna Redhead, whilst the table consensus was that it could be extended further north into the adjacent hub area. Site 2A was also clipped for aggregate areas on its eastern boundary.
- *Sites 2C & 2D (NG2.8, 2.9)* – clipping of the site boundaries to avoid aggregate extraction areas mean that the site has been put forward with modified boundaries, rather than putting forward the whole area and noting the points of contention. Comments from Group 1 also appear to suggest that the table consensus was that '*co-location will be resisted until it is known what the implications would be*'. This was the approach of the renewables industry representative on the table, but was not reflective of the overall opinion.
- *Site 2E (NG2.11)* – this site was noted for good representation, but the notes suggest that the ecological quality was felt to be low. The discussion on the day also noted that there wasn't

any information on additional ecological interest. This highlights the importance of using the additional ecological data that stakeholders are able to provide.

### c. Comments from the Yorkshire & Humber Regional hub

#### **General comments on the October hub meeting:**

We are pleased that the majority of stakeholders remained polite and professional during the Hub meetings, although are concerned that the fishing industry and the wind energy industry's views appeared to be given preference over conservation interests throughout.

We are concerned that, due in part to the way the meeting was chaired and run by the Net Gain team, the list of proposed sites which compiled as the Hub output is a list of sites which are representative of lesser socio-economic value rather than those of highest ecological importance. This is illustrated, for example, by the omission of the most important areas for seabirds within the Hub area from the proposed sites (e.g. areas offshore from Flamborough Head). Potential sites with medium or high fishing density or earmarked for wind energy development were regularly vetoed at the group stage - socio-economics were most strongly given preference over ecological value, and species FOCI and additional ecological features, were given scant attention. Areas of high biological activity were given no attention at all. Several times throughout the sessions hub members were encouraged to take socio-economics into account by Net Gain team members.

We are also concerned that the vast majority of sites proposed to go forward to the next stage do so in the report with the caveat that existing fishing and recreational activities would remain unaffected. We believe it is premature and inappropriate for Net Gain to support this view, or give assurance on this before site conservation objectives and management measures have been considered.

We are disappointed that there is very little mention of additional ecological features in the report. These were identified and brought to the attention of the facilitators during the meeting (for example seabird interests within the proposed sites as detailed below), despite being treated as low priority by most of the Hub members and Net Gain team members.

#### **Specific and individual site comments on the Yorkshire & Humber workshop report:**

- *Section 8* - As noted at the East of England regional hub, the proformas that were used to compile the league table were very incomplete. Consequently the league table was an inaccurate ranking of ecological value. It is therefore disappointing that this table has been included within the workshop report without appropriate caveats.
- *Site NG2.12* - We are concerned that the report concludes that static fishing would be unaffected by the proposal of this site as an MCZ. We believe this is premature as conservation objectives and management measures have yet to be considered by the group. We feel that stakeholders from other sectors may also feel alienated by this statement, as it appears to give the fishery precedence over their interests. We note that the report mentions that this site is important to rafting birds – I am not clear where this reference comes from, perhaps TWT? However, it was also noted during the Hub meeting that the northern part of this site was likely to be of importance for foraging Kittiwake, Razorbill, Gannet, Guillemot & Puffin, and that the southern end of this site is likely to be important for Little Terns, which are protected onshore at their nesting sites by the Humber Estuary SPA. We would wish to see these listed as interest features if the site goes forward.
- *Site NG2.14* - We welcome the inclusion of this site as a proposed MCZ to protect nesting seabirds. However, we would wish it to be extended beyond the intertidal zone to protect the key foraging area for these species (see seabird foraging radii maps supplied to Net Gain by

RSPB). This option was not fully explored at the Hub meeting as time was short and the facilitators/Net Gain were keen to focus the group's efforts on the broadscale habitat targets. We are concerned and dismayed that the Net Gain team have told the Hub that this site would only go forward if all existing human activities are allowed to continue unchecked. We feel this is a premature conclusion on their part, as conservation objectives and management measures have yet to be discussed or considered at for the proposed site. This site is host to a wide range of fishing and recreational activities, some of which may be incompatible with conservation of its ecological features. We therefore feel it is inappropriate for the NG team to give stakeholders these kinds of assurances at this stage.

- *Site NG2.15* - We would support this site being forward as it was noted at the Hub that this site is likely to be of value for some species of nesting and foraging seabirds (Kittiwake, Razorbill, Great Cormorant, Gannet (foraging only), Fulmar (foraging only)). However, this information has been omitted from the report. We would expect this information to be included at the next stage by Net Gain.
- *Site NG2.17* - This site was also noted as an important site for foraging seabirds (for details of this see the ESAS data/forthcoming JNCC/TWT data analysis), and we would support the selection of this site on the basis of this and other ecological value not covered by the pSAC designation. This additional ecological interest was recorded on the proforma, but has been omitted from the text of the report. We would expect to see seabirds listed as an interest feature for this site as a proposed MCZ. The boundaries of this site were much amended and the size reduced in order to avoid important areas for fishing, aggregates and wind energy. This is a clear example of the weighting given to socio-economic factors at the Hub meeting as, this site is currently undergoing designation as an SAC and was selected by the conservation organisation representatives present as a potential MCZ in order to protect ecological features not covered by the SAC designation.

#### *d. Comments from the North East Regional Hub*

- *dMCZ NG2.15* – we note that ‘foraging seabirds’ are included under additional important features. There are notable colonies of breeding seabirds along this stretch of coastline, including important numbers of breeding kittiwake. The waters adjacent to these colonies would primarily be important as an area where seabirds would carry out maintenance behaviour such as loafing and preening. Waters further offshore within the dMCZ may also have value for foraging seabirds: however, in the absence of ESAS data mentioned above it is not possible to state whether this is the case. This issue will need to be investigated once the ESAS data is available.

Extending the dMCZ area to include the BAI identified by the North East further to the east would have the benefit of protecting a wider range of BSH - and in particular habitat FOCI which do not appear to be present in the dMCZs so far selected in the northern North Sea. North East regional hub members identified a number of sites in this area in the group sessions - 1E, 2C, 2J, 3E – but were not given any time to consider the merits of these sites. Instead, Net Gain staff advocated the inclusion of the site boundary identified by the Yorkshire & Humber meeting - even though it was for a different set of habitats and species altogether. We feel that Net Gain had to seek a quick solution in this area due to time pressures, and in doing so discounted the hard work done in the North East hub to identify potential sites in this area.

- *dMCZ NG2.18* – we are supportive of a dMCZ within the Dogger Bank, as it potentially has considerable importance for foraging seabirds, for example kittiwake and gannet from the

Flamborough Head and Bempton Cliffs Special Protection Area (SPA) colonies. We welcome the inclusion of these as 'additional important features'. This area is also likely to be important for other mobile species such as harbour porpoise, which should also be noted as an 'additional important feature'. The dMCZ could also offer protection to other species and habitats that will not be protected by the proposed Dogger Bank Special Area of Conservation (SAC), though this will require further investigation.

NG2.18 lies adjacent to a much larger area dMCZ NG2.17, identified by the Yorkshire & Humber group: amalgamating these two dMCZs into a single, larger area would prevent bureaucracy and confusion among sea-users, and deliver a greater conservation benefit.

- *dMCZ NG2.19* – the RSPB supports this dMCZ and in particular the inclusion of the waters around Coquet Island within this dMCZ, as these waters are highly important for loafing and foraging seabirds from the Coquet Island Special Protection Area (SPA), and also eider duck, which form part of the Coquet Island Site of Special Scientific Interest (SSSI). The 'additional important features' should refer to roseate tern, common tern, arctic tern, puffin, eider and black-headed gull, all of which are SPA/SSSI features using the surrounding waters.

Eider duck are also an interest feature of the Northumberland Shore SSSI, a SSSI that covers the intertidal habitats along the entire length of this dMCZ – these eiders will regularly use waters along the whole dMCZ. The BTO Wetland Bird Survey data we have provided will provide evidence for this. Druridge Bay is well-known for its high biodiversity interest, as indicated by its value for range of foraging seabirds in the summer as well as other interests such as harbour porpoise.

It is worth noting that there is an existing Voluntary Marine Nature Reserve at St. Mary's Island, and the Dove Marine Laboratory in Cullercoats is also close by, which would make monitoring of this dMCZ more achievable.

- *dMCZ NG2.20* – the RSPB supports the inclusion of this dMCZ, as it is likely to hold important concentrations of seabirds during both the breeding and wintering seasons, including seabirds from the globally-important colonies of the Farne Island SPA, Coquet Island SPA and the Bass Rock SPA. (Nb. the first bullet of the 'additional important features' section should read 'little auk, puffin, guillemot'.) In particular, we welcome the inclusion of the waters above the Farn Deep outcrop feature, as these are known to be a highly important area for foraging seabirds and mammals.
- *dMCZ NG2.21* – the RSPB supports the inclusion of this dMCZ, as it is likely to hold important concentrations of seabirds during both the breeding and wintering seasons, including seabirds from the globally-important colonies of the Farne Island SPA, Coquet Island SPA and the Bass Rock SPA.
- *dMCZ NG2.22* – in the absence of ESAS data, it is currently unclear whether this dMCZ does or does not have value for foraging seabirds, and therefore whether seabirds should be included as an 'additional important feature'. This will need to be investigated once the ESAS data is available.
- **Potential additional MCZs in the North East regional hub area**
  - i) *Farne Islands* – the waters around the Farne Islands are known to be highly biodiverse. There would be considerable merit in identifying the waters around the Farne Islands as an MCZ, to provide protection to those habitats and species present that are not the primary

interest features of the Berwickshire & North Northumberland Coast SAC. This would also provide protection to loafing and foraging seabirds associated with the Farne Islands SPA.

ii) *Tees Bay* – the RSPB welcomed the identification of Site NE5\_B3 as a BAI at the June hub meetings, so we are disappointed that no dMCZs and only a small BAI have been identified in this area during the latest round of hub meetings. Waters within Tees Bay are likely to be of high biological richness because they support a nationally-important colony of common terns that nest next to the Tees Estuary and commute out to sea to forage, and also large numbers of auks (e.g. guillemot) in the post-breeding period. Conservation benefits would accrue from identifying an MCZ based on the current BAI but extended inshore into the Bay and towards Hartlepool, complimenting the existing estuarine SPA.

iii) *Durham Heritage Coast* – the RSPB supports the comments on p60 of the 2<sup>nd</sup> iteration submission relating to the Durham Heritage Coast, and recommend that this area is reconsidered for MCZ status at the next regional hub meeting.

### **3. Additional support for next iteration (relating to first page of pro-forma)**

The RSPB would like to make the following suggestions:

- a. In order to get feedback from our sector, as opposed to internally within the RSPB, it is crucial that a reasonable deadline is set for sector representatives to respond, and that consultation documents are made promptly available on the Net Gain website. Getting feedback from individuals who are not familiar with the process in the short time provided after the SAP submission was made available is simply not realistic.
- b. It would be helpful if the regional hub reports and SAP submissions were located in a distinct and well-labelled part of the Net Gain website as they are currently difficult to find, and it is easy for individuals who are unfamiliar with the process to end up looking at the wrong documents e.g. 1<sup>st</sup> iteration not 2<sup>nd</sup> iteration.
- c. It is unclear how the responses you receive through this consultation will be used. An explanation of this would be helpful – and would encourage greater response rates from within our sector.
- d. It would have been useful to number the BAIs identified so stakeholders could more easily provide comments on these as well – if BAIs are still being considered following the next round of hub meetings, we recommend they are numbered.
- e. Maps that show individual dMCZs at a finer scale rather than a single map for the regional hub area would help get feedback from individuals with knowledge of specific locations.



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

Name **Jamie May** .....

Sector represented **RWE npower renewables**.....

Regional Hub **East of England Hub** .....

RWE has had an active commercial interest in the area around Inner Gabbard, Outer Gabbard, and Galloper sandbanks since 2008 and in the wider Netgain area since 2003 from its Triton Knoll interest. RWE is also a shareholder of Forewind Limited and therefore has a commercial interest in Dogger Bank. Together with our project partner SSER, RWE has an in-depth knowledge of the area and extensive survey data across our project areas and cable routes.

RWE npower renewables has a 50% interest in then proposed Galloper wind farm project with SSER.

### General comments:

RWE shares RenewableUK's primary concern that the lack of knowledge on the implications of designation of MCZs on renewables activities and the uncertainty, potential for delay and increased cost this creates for developers who are looking to develop multi-billion pound projects. The renewables industry acknowledges the potential for co-location of renewables and MCZs but cannot currently endorse this approach until further guidance is provided on the conservation objectives and management measures of designation. We also note that, although the SAP and others have proposed co-location, the Sensitivity Matrix indicates that most of the Broad Scale Habitats (BSH) and Features of Conservation Importance (FOCI) identified in each dMCZ for protection are sensitive to the activities undertaken by the renewables industry. This would again suggest a level of restriction on activities or management measures for the MCZ. This uncertainty on the implications of a MCZ designation also comes at a critical time for the industry as it is looking to expand rapidly and is competing for global investment which may choose to locate elsewhere. Offshore wind is also critical to meeting our legally binding EU 2020 renewable energy targets and for mitigating the impacts of climate change.

RWE has concerns with how the compatibility matrix is being used by stakeholders with too little information or guidance being provided leading to incorrect or misleading results. Further, many stakeholders appear to be working on the assumption that cabling would be allowed through MCZs but this does not appear to be borne out in the Sensitivity Matrix which indicates medium or high sensitivity for cabling through most BSH and FOCI. This assumption compounded by the fear of onerous mitigation measures to address perceived impacts from cabling, are considered unreasonable.

Consistent with the messages expressed at previous meetings, RWE has a continuing concern that the process of identifying MCZ sites is being undertaken too rapidly, without appropriate level of the marine spatial planning, some of the habitats and species listed for inclusion and without sufficient consideration of the underlying fundamental weaknesses of the available data. The latter point includes modelled sediment distribution at the proposed BAI which is an amalgamation of 2 D,E,G.

The continued promotion of the perceived benefits of co-locating wind farms and MCZs by nature conservation interests is of concern. In this regard RWE supports the Renewable UK paper on co-location.

**Specific comments**

The last stakeholder group meeting were advised that the proposed BAI which is an amalgamation of 2 D,E,G coincided with the edge of the Galloper Wind Farm area. Apparently the request to change the boundary of the BAI has not been taken into account.

Further, we have concerns of the perceived value of focussing on this area given that RWE and SSE has undertaken detailed geophysical surveys of the GWF area and found that areas of seabed are not covered by any sub-tidal sands and gravels (exposed London Clay seabed surface primarily) but instead a very thin incomplete veneer of Holocene (sands and gravels) sediments including small isolated pockets of lag (gravel) material - therefore to base a decision to include a wide BAI area on questionable data (modelled data in this case) does not demonstrate sound scientific process and on this basis RWE would expect to see further justification.

Finally, in line with RUK and Crown Estate messages on co-location, I would like raise a concern that the dMCZ at NG 2.1 will have potential effects on our ability to consent the inshore export cable route to the proposed land fall at Sizewell. RWEs grid connection agreement with National Grid is at Sizewell and therefore the export cable route necessarily runs from our proposed wind farm to the coast passing though the dMCZ area near Sizewell Banks. I would like further comfort that an appropriate level of marine spatial planning is taken into account before final MCZ areas are designated and adopted. Given the banality of installing cables in the seabed and the impact on benthic habitat being, almost without exception, within the range of natural diurnal effects (from natural dynamic processes) in seabed level and composition; the notion of requiring onerous mitigation conditions being imposed within an MCZ for this type of activity is of concern, especially when compared with tangible effects caused from certain other marine uses.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.1	X			Request for re-evaluation of perceived cabling impact on BSHs/FOCI.  Assumption that cabling is benign compared to other intrusive marine activities	Additional cables will be required for proposed Galloper Wind Farm site.  Greater Gabbard Offshore Winds Limited (GGOWL) cable already installed	Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required . Mitigation is currently not considered necessary



<p><b>BAI 2_D,E,G over Galloper Round 2.5 Site (EE Hub)</b></p>	<p>X</p>			<p>A request was agreed by stakeholders at the EE Hub meeting and recorded in the minutes to adjust the boundary of 2_G to follow the lines of the 2_F which would result in the area avoiding the Round 2 Galloper Extension Site. This has not been adhered to in the report/GIS shapefile distributed and RWE request that 2_E be amended as agreed.</p> <p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Applying these changes removes all expected impacts stated opposite RWE likely to change opinion to positive and SUPPORTIVE of this BAI.</p>	<p>Overlays the south-easterly section of the <b>SSE Renewables/RWE npower renewables Round 2.5 Galloper Wind Farm Site</b> (area furthest from land) which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£1.512billion in capital investment  350,000 households powered by renewable energy  £200million a year in revenue from electricity generation  720,000 tonnes of CO2 reduction  17,000 tonnes of SO2 reduction  5,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	
---	----------	--	--	---	--	--

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

Name **Trevor Baker** .....

Sector represented **RWE npower renewables**.....

Regional Hub **Lincs and Wash Hub** .....

Although I fully appreciate the purpose of developing the MCZ network and applaud the hard work of the NetGain team, I feel it is appropriate to feedback the following personal and unfortunately largely negative comments after the recent meeting.

### General comments:

Consistent with the messages expressed at all meetings, I still retain a major and persistent concern that this process of identifying MCZ sites is being undertaken too rapidly, out of synchrony with the marine spatial planning process, some of the habitats and species listed for inclusion and without sufficient consideration of the underlying fundamental weaknesses of the available data. The latter point includes both modelled sediment distribution (NG2.4 being the most obviously flawed in this regard) and the FOCI data that are more indicative of where sampling has taken place than where these species may be present. It would appear that the boundary of NG2.22 has in particular been influenced by these data points.

It is also my belief that the lack of a clear understanding of the implications of designation, notably in terms of both potential management measures and restrictions in regard to development and operations is a major threat to securing full stakeholder buy-in to this process (and critically the possible outcomes as we move forward from this point).

The continued promotion of the perceived benefits of co-locating windfarms and MCZs by nature conservation interests is of concern to myself and colleagues. In this regard I refer you back to the Renewable UK paper on co-location.

The last minute withdrawal of Natura 2000 sites from the consideration process is an extremely visible consequence of the undue haste with which this process is being carried out. Considering the inclusion of MCZs within at least SAC boundaries would have been an obvious and logical first step in developing an MCZ network with least potential conflict with other marine users and best practical management for the agencies. This also created an additional level of uncertainty of what was required and how best (features and degree of potential user conflict) to identify the best sites for proposal. It also eroded faith in the process). I do, however, acknowledge the efforts to mitigate this by the NetGain team at the workshop.

As Natural England and JNCC are lead organisations in the project, is it not questionable that NE employees present at hub meetings were proposing and advocating sites and site boundaries rather than being present as observers or at most sources of technical clarification.

The substantial spatial overlap with other hub areas in the materials provided to us has been openly used at meetings by individuals seeking to move the potential for designation away from their own interest areas with the potential consequence that there is an artificially heightened perception of “support” for these peripheral sites. Further, where there

is overlap there will be a tendency (or at least risk) of interpreting a greater level of acceptability of these locations from a perception of greater positive consensus where they are jointly promoted by two hubs.

Due consideration of the criteria described in the ecological guidance document has been lacking and is apparent from the latest map of sites, not least with regard to size of sites, their geographic (particularly nearshore vs offshore) spread and the number of replications.

The limited availability and understanding of the detail of the sensitivity matrices is an additional weakness of the process and therefore also the underlying robustness of the proposed sites. I would be extremely concerned if full consideration of the temporal, spatial and indeed ecological context of activities such as cable laying were not properly considered during MCZ designation process and sensitivities determined more fully.

Although I appreciate the rationale for the application of a support factor to site identification, I do not feel that this provides a sufficiently useful metric to aid site identification and the analysis of those proposed. The process is too readily influenced by the level of representation of a particular interest, the vociferousness of the individuals present and also where the interest of those individuals are focussed – someone with a very local interest only would naturally express support for any area that is beyond their own concerns. This is implied by the Lincs hub map which only shows areas of “support” or “strong support” (Hub report figure 1). On this point I am not convinced that there is as high a level of support for the areas proposed as suggested in the SAP report, though this can only really be tested at the next iteration (and hopefully with additional information on the issues highlighted in this response).

#### **Specific comments**

The distribution of “*Sabellaria* reef” in Figure 4 of the Lincs hub report is completely at odds with information presented for cSACs such as Inner Dowsing, North Norfolk /Saturn Reef . This points to a fundamental misinterpretation of the difference between a *Sabellaria* reef and the natural occurrence of *Sabellaria* in a non-reef conditions that in turn further misleads the lay stakeholder.

Some sites were proposed for specific interest features such as the Silver Pit (NG2.9) and the steep banks off Docking Shoal (NG2.6), however the boundaries were then arbitrarily drawn to substantially wider extent with out due sufficient and appropriate consideration of the purpose for doing so. The suggestion that some areas within a site may not be provided the same level of protection as others, if this were to be the case why include in a designation in the first place?

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

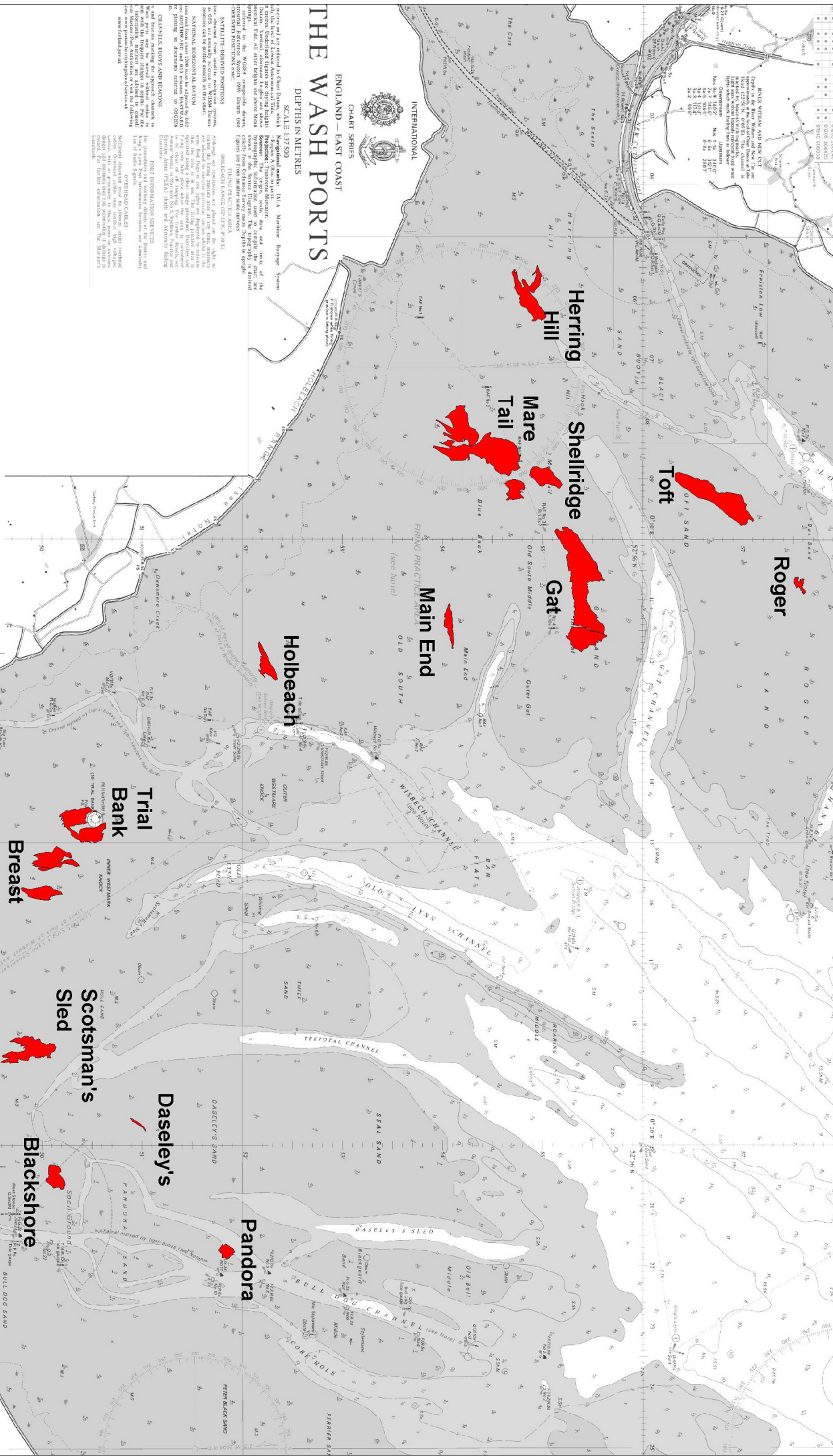
or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG

**Distribution of Intertidal Mussel Beds Surveyed in 2010**



INTERNATIONAL CHART SERIES ENGLAND—EAST COAST DEPTHS IN METRES SCALE 1:37,500

**THE WASH PORTS**

INTERNATIONAL CHART SERIES ENGLAND—EAST COAST DEPTHS IN METRES SCALE 1:37,500

**THE WASH PORTS**

INTERNATIONAL CHART SERIES ENGLAND—EAST COAST DEPTHS IN METRES SCALE 1:37,500

**Herring Hill**

**Mare Tail**

**Shellridge**

**Toff**

**Roger**

**Main End**

**Gat**

**Holbeach**

**Trial Bank**

**Breast**

**Scotsman's Sled**

**Daseley's**

**Blackshore**

**Pandora**

**Not to be used for Navigation**

(c) British Crown and Seadzone Solutions Limited. All rights reserved. Licence No.091009.021. This product has been derived in part from material obtained from the UK Hydrographic Office with the permission of the Controller of Her Majesty's Stationary Office and the UK Hydrographic Office (www.hydro.gov.uk).



**Matthew Mander**  
Clerk and Chief Fishery Officer

*Over 100 years of Fisheries Management*

*Established 1894*



6 North Lynn Business Village  
Bergen Way, King's Lynn  
Norfolk, PE30 2JG

TEL: (01553) 775321  
FAX: (01553) 772031  
E-Mail: [mail@esfjc.co.uk](mailto:mail@esfjc.co.uk)  
[www.esfjc.co.uk](http://www.esfjc.co.uk)

Steve Barnard  
Net Gain  
The Deep Business Centre  
Tower Street  
Hull  
HU1 4BG

Your ref:  
Our ref: JCS/JW/2/21

15<sup>th</sup> November 2010

Dear Steve

### **FEEDBACK ON NET GAIN SECOND ITERATION REPORT**

Thank you for sending a copy of the reports from the Regional Hub meetings (for the East of England, and Lincolnshire & the Wash), and the Second Iteration Report submitted to the Science Advisory Panel (SAP). Although the Joint Committee has opted not to participate directly in the selection of possible Marine Conservation Zone (MCZ) sites, officers are aware of the benefits of involvement in the process, as advisors on fisheries and wider ecological aspects, and because of our inshore fisheries enforcement role. Our comments on the Second Iteration Report are focussed on the site selection process, data issues, and on the draft MCZs that are located wholly or partially within the Joint Committee's district.

#### *Opportunities for fishing sectors to provide feedback on operational impacts of draft MCZs*

ESFJC is concerned that the recreational sea angling (RSA) and commercial fishing sectors might not have had an opportunity to review and comment on the second iteration report – and critically, might not therefore provide feedback on how the selection of the dMCZs could affect their sectors if current activities are restricted. Although some RSA and commercial fisheries representatives have attended the Regional Hub meetings (for East of England, and Lincolnshire & the Wash – i.e. the hubs that Joint Committee officers have been involved with), Joint Committee officers are not confident that these few will be in a position to gather feedback from large numbers of individuals within the various fishing sectors.

Joint Committee officers raised this concern with Net Gain via a telephone conversation on 4<sup>th</sup> November, and the Joint Committee has attempted to advertise the current consultation via its own officers. It is recognised that the Net Gain project team, via its liaison officers, has arranged meetings with some fishing individuals and organisations – this is welcomed by the Joint Committee. Officers are also aware that there is a large degree of reluctance in some areas in commercial and RSA fishermen

to participate in the MCZ selection process, because of fears over repercussions on their activities and concerns over the process. However, the Joint Committee considers it important that everything possible is done now to engage members of these sectors, to obtain their feedback on the draft MCZs, to avoid bigger problems later in the process.

#### *Development of management measures*

The Joint Committee considers that it will be the role of the Marine Management Organisation (MMO) and Sea Fisheries Committees (SFCs) or Inshore Fisheries & Conservation Authorities (IFCAs) to develop appropriate measures to manage fishing activities within MCZs. Officers recognise the stakeholder-led ethos of the MCZ projects, but decisions regarding management measures cannot be taken without detailed consideration and understanding of fishing impacts, external environmental factors, and socio-economic implications. Best practice in fisheries management (and the Joint Committee’s own experience) has shown that achieving suitable, supported management measures for fishing activities within conservation sites requires discussions with fisheries scientists, conservation advisors (Natural England) and members of the fishing industry. This approach will be crucial in achieving compliance – and therefore meeting the objectives of the MCZ process for developing a well-managed, supported network of Marine Protected Areas.

The basis for developing management measures is evidence about impacts of activities on site features. It is therefore crucial that regulators (MMO and SFCs/IFCAs) have access to the compatibility programmes “PRISM” and “PISA” and the supporting evidence on which compatibility outcomes were achieved.

#### *Consideration of compatibility of activities within Regional Hub meetings*

Access to compatibility data is crucial for stakeholders tasked with proposing areas for MCZ designation. It was apparent at the Regional Hub meetings that there was not sufficient time at the round 3 Regional Hub meetings to adequately interrogate the PRISM and PISA compatibility programmes – to inform the MCZ site selection process. [We have requested access to these systems for our own considerations as inshore fisheries managers – see point above.] Stakeholders require confidence in knowing what restrictions on their activities would arise as a result of areas being selected for MCZ designation. For example, a commercial fishing representative might be reluctant to propose an area for designation because he had insufficient data on the likely consequences for his sector (and other sectors) of that area achieving designation. To date this knowledge has not been evident. This point is re-visited below in my comments on individual draft MCZs – it recurs at every site.

The compatibility of activities with MCZ features (broad scale habitats, Habitat and Species Features of Conservation Interest) is critical to site designation. Regulators and stakeholders require evidence relating to the compatibility scores, particularly where these scores affect whether or not a current activity may continue. This evidence is essential to provide stakeholders with confidence in the compatibility matrices, and to ensure that consensus is based on knowledge rather than assumptions of implications of designation for ongoing activities.

*Data reliability – Habitats of Conservation Importance*

The Joint Committee has previously submitted concerns (letter, 8<sup>th</sup> October 2010) relating to the Habitats of Conservation Importance (HOCI) map. These concerns remain. The Joint Committee officers’ own knowledge of parts of the Net Gain area – in particular, the Wash and its approaches – has been gained from years of surveys of intertidal and sublittoral areas, in addition to collective experience of inshore fisheries throughout Lincolnshire, Norfolk and Suffolk.

Annex I of the Second Iteration Report (Net Gain response to Science Advisory Panel feedback on the 1<sup>st</sup> iteration) showed that the SAP identified data accuracy and confidence as being an issue, but focussed on confidence with the UKSeaMap data layer. The Joint Committee’s main queries were with the HOCI map – and in particular the location of blue mussel beds, *Sabellaria spinulosa* (Ross worm) reef, seagrass beds and littoral chalk communities.

Blue mussel beds – I have enclosed a copy of the Joint Committee’s latest chart showing the distribution of blue mussel beds in the Wash (based on surveys undertaken between September and November 2010). It is considered that this constitutes specific, reliable data to replace that shown in the HOCI map.

*Sabellaria spinulosa* reef – Specific data on the distribution of *Sabellaria spinulosa* reefs should be sought from Natural England (Marine Evidence team), who are currently undertaking a wholesale review on the distribution of this feature in the Wash and its approaches (this area contains most of this feature in the Net Gain region). The Joint Committee has submitted its own survey data to Natural England; this is complemented by surveys undertaken on behalf of Centrica Renewable Energy Limited (CREL). Natural England are continuing to analyse these datasets in order to develop appropriate conservation objectives for this feature in the Wash & North Norfolk Coast Special Area of Conservation (SAC), and in the Inner Dowsing, Race Bank and North Ridge cSAC. The Joint Committee’s current knowledge of the extent of *Sabellaria spinulosa* reef in this area has prompted us to query the habitat extent figures given for the proposed sites NG2.2, NG2.3 and NG2.4.

Seagrass beds – the Joint Committee does not undertake surveys for this habitat feature. However, Joint Committee officers conduct regular extensive surveys of the Wash, including seabed habitat mapping (intertidal areas) – these surveys have not identified any seagrass beds in the Wash. I enclose a recent habitat map – to be considered as specific reliable data, showing the absence of seagrass beds in the Wash. I understand that Natural England (East of England Team) have recently undertaken surveys of seagrass beds along parts of the Norfolk coast – these could provide further specific data to inform Net Gain.

Littoral chalk communities – the Joint Committee does not undertake surveys for this habitat feature, but officers’ local knowledge has prompted us to challenge the distribution of this feature shown on the HOCI map – for example, much of the Norfolk coast has been depicted as littoral chalk communities, whereas in fact this habitat is limited to particular areas on the Norfolk coast.

*Gap analysis – existing protection of habitats and species*



The Joint Committee queries whether certain Species of Conservation Importance (SOCI) are already protected under existing designations at coastal sites, e.g. tentacled lagoon worm, starlet sea anemone and lagoon sand shrimp. Similarly, intertidal mussel beds, and *Sabellaria spinulosa* reefs are protected under SAC and Site of Special Scientific Interest (SSSI) designations. Has a gap analysis been done for the HOI and SOCI, or just for the Broad Scale Habitats (BSHs)?

The gap analysis is hugely important in relation to target areas for the Net Gain project. The question whether SPA designations afford protection to subtidal sand is critical. The Joint Committee, other regulators and marine stakeholders need to know what the Conservation Objectives for the new SACs and SPAs are in order to develop appropriate management measures for these sites.

This re-iterates the key concern that stakeholders are being tasked with proposing MCZ sites without a clear understanding of what management measures will be applied.

*Table 1: Assessment of Adequacy for Broad Scale Habitats within the dMCZ network*

The Joint Committee queries the location of (i) intertidal biogenic reefs, and (ii) subtidal biogenic reefs; in the Net Gain region, and what these reef features constitute – blue mussel, horse mussel, *Sabellaria spinulosa* or other types of reef?

*Table 2: Assessment of replication of habitat FOCI within dMCZ network*

The Joint Committee queries the extent and location of blue mussel beds, *Sabellaria spinulosa* reefs and seagrass beds, resulting in the figures in this table. The data being provided by the Joint Committee (distribution of intertidal mussel beds in the Wash) is at variance with the figures in Table 2: (extent available within Net Gain): for example, the Joint Committee’s latest mussel surveys (autumn 2010) identified a total of 392ha (3.92 km<sup>2</sup>) intertidal mussel beds in the Wash (3.68km<sup>2</sup> in 2009).

The extent figures for *Sabellaria spinulosa* reef (e.g. 320.92km<sup>2</sup> in existing SACs, SSSIs, SPAs and cSACs) are widely different (much greater by two orders of magnitude) from the Joint Committee’s own data on this feature (e.g. <2km<sup>2</sup> in the Wash and Lincolnshire coast (inshore) combined). Officers therefore recommend urgent liaison with Natural England’s marine evidence team. A very relevant debate is the difference between the presence of *Sabellaria spinulosa* as crust (low density, low elevation, low diversity) as opposed to true reef (higher density, elevation and epifaunal diversity); *Sabellaria* crust is commonplace but true reef habitat is much more rare.

*Table 5: Current activities recorded in the dMCZ network*

**Sea Fisheries Committee closures:** An inshore trawling restriction is in place throughout the whole of the ESFJC District (Lincolnshire, Norfolk and Suffolk) in the 0-3nm zone. This restriction only applies to vessels over 15.24m between Donna Nook (Lincolnshire) and Blakeney, and between Mundesley and Dovercourt (Harwich), but applies to all vessels between Blakeney and Mundesley. Additional



closures are applied at selected locations, e.g. the intertidal mussel and cockle beds in the Wash are only opened to fishing at selected times. It would be difficult to map these as SFC closures but it should be highlighted that the molluscan fisheries in the Wash are frequently surveyed, tightly managed and heavily monitored. Joint Committee officers have sent spatial data to the Net Gain team in relation to these fisheries.

**UK benthic fishing gear** – Benthic fishing does occur in NG 2.3 (the Wash) as well as all other areas, although was not picked up in VMS data. NG 2.3. is a very important area for benthic fisheries, especially beam trawling, mussel dredging and cockle dredging.

**UK static fishing gear** – Static fishing does occur in NG 2.2. (Norfolk coast inshore) and NG 2.3 as well as the other areas shown. Very important potting fisheries and some netting / lining occurs in these areas. It is noted that both the benthic and static gear fisheries were identified in these areas via the Fishermap data.

**Brown crab, brown shrimp, cockle, lobster, mussel, and pink shrimp fisheries** – details on where these fisheries occur in relation to the dMCZs is provided in the attached Table 1.

**Nephrops fishery** – there is no Nephrops fishery in NG 2.1 (inshore Suffolk coast).

*Comments on draft MCZ site descriptions*

See attached Table 2.

*Impact Assessment*

The Joint Committee intends to submit comments on the draft Impact Assessment when this is available to review. In particular, this will include consideration of the need for the Joint Committee (or Eastern IFCA) to allocate resources required to develop, manage, monitor and enforce MCZs.

Thank you once again for the invitation to comment. The Joint Committee is committed to supporting the Net Gain project. If you have any queries on the information or comments provided, please do not hesitate to contact me.

Yours sincerely

Judith Stoutt  
Marine Environment Officer

cc. Paul Lane, North Eastern Sea Fisheries Committee



Table 1. Summary of fishery information held for each Net Gain dMCZ – based on ESFJC Fisheries Mapping Project

Net Gain dMCZ	Fishery target species	Gear used in area	Spawn/nursery/juveniles	Other comments
2.1	Bass Dab, flounder Whiting	Lines Drift netting		Bass main target during the summer; whiting, flounder and dab secondary catch.
	Brill & turbot	Drift netting Beam trawling		Part of mixed fishery during the summer
	Brown shrimp	Shrimp beam trawl		Year-round, inshore fishery
	Cod	Longlining (main) Trawling (some) Netting		Targeted in winter, spring and autumn particularly.
	Crab & lobster	Potting		Year round (but more activity between Mar-Oct).
	Dogfish	Mixed	Some spawning grounds in this area	
	Herring & sprat	Netting Trawling Pair trawling		Autumn, Winter and Spring – with the early part of the season mostly in the north then moving down the coast.
	Mackerel	Lining		Targeted during the summer – mostly on shoal grounds
	Plaice		Some breeding grounds for this species – generally sandy/mixed areas (often coinciding with dredge grounds)	Caught along shoal grounds and along contours.
	Sandeel			On shoal grounds
	Skate (thornback ray, blonde ray)	Trawling Lining		Part of mixed fishery – skates caught mostly in Winter months
	Sole Dab, flounder Whiting	Drift netting Set/cross tide netting Trawling		Netting in summer months, some trawling year-round. Sole is main target species.
	Whelk	Potting		

Table 1. Summary of fishery information held for each Net Gain dMCZ – based on ESFJC Fisheries Mapping Project

Net Gain dMCZ	Fishery target species	Gear used in area	Spawn/nursery/juveniles	Other comments
2.2	Bass	Lining		Mixed fisheries. Some activity most of the year – concentrated inshore during the summer, and further of Autumn through Spring. Cod and skate mostly Winter & Spring.
	Cod	Netting		
	Dogfish			
	Skate			
	Whiting			Year round, close inshore.
	Brown shrimp	Shrimp beam trawl		Targeted year-round. Main local fishery. Inshore (within ~ 3nm) principally targeted between late March-October; elsewhere effort is year-round but can move following seasonal migration patterns.
	Crab & lobster	Potting		Autumn (mostly in north) through to Spring (moving to south as season progresses). Netting throughout season, pair trawling further south Winter/Spring.
2.3	Herring & sprat	Pair trawling Netting		Winter and spring (caught alongside skate, bass, whiting)
	Sole	Trawling		Targeted year round
	Whelk	Potting		
	Bass	Netting		
		Lining		
	Brill	Mixed		
	Brown shrimp (Crangon)	Shrimp beam trawl		Year round, close inshore (browns). Pink – mostly targeted seasonally (late Autumn – Spring) but currently low uptake on this fishery due to markets.
	Pink shrimp (Pandalus)			
	Cockle & mussel	Handrakes Suction dredging Mussel dredging	Self-seeding	Main Wash fisheries already heavily regulated and managed under Wash Fishery Order to meet European Marine Site objectives and fisheries sustainability targets. Some (significant) sublittoral seed mussel off Lincs coast.
	Crab & lobster	Potting		Targeted year round, with activity peaking during Summer (Mar-Oct)
Herring & sprat	Pair trawling		Former winter fishery – only occasionally prosecuted currently due to lack of market opportunities	

Table 1. Summary of fishery information held for each Net Gain dMCZ – based on ESFJC Fisheries Mapping Project

Net Gain dMCZ	Fishery target species	Gear used in area	Spawn/nursery/juveniles	Other comments
2.4	Skate (thornback ray)	Trawling Netting	Yes – some spawning grounds	Targeted Spring/early Summer
	Whelk	Potting		
	Bass	Lining Netting		Targeted during Winter (esp. lining) and Spring-Summer (esp. netting).
	Brown shrimp	Shrimp beam trawl		Year-round
	Cod Skate Dogfish Whiting Brill	Lining Netting		Particular target species change seasonally, with cod dominant in Winter, and skate in Summer (although also caught Winter-Spring).
	Crab & lobster	Potting		Year-round fishery with peak activity during Summer (Mar-Oct).
	Herring & sprat	Pair trawling		Autumn (mostly in north), Winter – Spring. Netting from beach-launched rowing boats throughout season, pair trawling further south.
	Sole	Netting		Winter and Spring
	Whelk	Trawling		
		Potting		
2.7	Bass Cod Dab & flounder Brill & turbot Whiting	Lining Trawling Netting Angling		Bass, cod targeted during Winter, Spring. Other species also taken but secondary importance.
	Brown shrimp (Crangon) Pink shrimp (Pandalus)	Shrimp beam trawl		Year-round (brown) Seasonal (predominantly Autumn-Spring) – pink.
	Skate (Thornback ray) Bass Whiting	Lining Trawling Angling	Yes- spawning April-June	Skate targeted during Spring-Autumn, some bass also taken. Occasional whiting.

Table 1. Summary of fishery information held for each Net Gain dMCZ – based on ESFJC Fisheries Mapping Project

Net Gain dMCZ	Fishery target species	Gear used in area	Spawn/nursery/juveniles	Other comments
2.8	Sole Brill & turbot Dab	Netting Trawling		Sole targeted Spring-Autumn, mostly in inshore grounds. Brill, dab and some turbot taken as secondary species/bycatch.
	Brill & turbot	Trawling	Yes – in May (mostly Brill)	Part of mixed fishery in Spring (April-June)
	Cod, whiting	Mixed		Cod targeted Autumn and Spring (some whiting also caught)
	Skate (Thornback ray)	Trawling Lining		Traditional fishery March-May
	Sole, dab	Trawling	Spawning (sole) in May	Sole targeted April-July; dab also caught as bycatch

Table 2. ESFJC Comments on draft MCZ site descriptions

Site	Statement in Net Gain 2 <sup>nd</sup> iteration report (draft MCZ site descriptions)	ESFJC Comment
NG 2.1 Inshore Suffolk	<p>Extent of intertidal habitats (BSH): 5.31 km<sup>2</sup></p> <p>Compatibility of activities with site features:</p> <ul style="list-style-type: none"> <li>• Potting, netting and long-lining not incompatible with BSH</li> <li>• Benthic trawling – management measures to look at variations in gear type in relation to sensitivity benchmarks</li> </ul> <p>Stakeholders felt there should be extended restrictions on large trawlers such as beam trawlers. Dutch and Belgians use mostly larger vessels...</p> <p>...however it is possible that stopping the larger vessels would also impact on aggregate extractions operations.</p> <p>Subtidal mixed sediment is only affected by sea bed damage – consequently drift nets would not be a problem</p>	<p>Seems much too low for site that includes &gt;80km coastline plus estuaries</p> <ul style="list-style-type: none"> <li>• What level of certainty can be applied here?</li> <li>• Key role for fisheries managers, conservation advisors and fishing sector representatives to discuss detail of management according to specific gear types.</li> </ul> <p>There are existing restrictions on large trawlers (in 0-3nm zone via ESFJC byelaw). Non-UK vessels are not allowed to fish within 6nm. Belgian vessels are allowed to fish in the 6-12nm zone off Suffolk (demersal gear) and French are allowed to fish in 6-12nm zone but not north of Lowestoft.</p> <p>Management must be related to Conservation Objective: if the purpose of restricting large trawlers is to limit abrasion, it seems appropriate to restrict aggregate extraction too.</p> <p>This BSH covers a large area (353.15km<sup>2</sup>); this could result in significant restrictions on fishing activities that are deemed to cause seabed damage (e.g. benthic towed gear?)</p>
NG 2.2 Inshore central	<p>Extent of intertidal habitats (BSH): 0.03 km<sup>2</sup></p> <p>Scientific value – not highlighted</p>	<p>Seems much too low for site that includes approx. 30km coastline</p> <p>Suggest site has scientific value as is frequently surveyed by Seasearch ?</p>

Norfolk	<p>Compatibility of activities with site features:</p> <ul style="list-style-type: none"> <li>• Current levels of static gear activity is compatible with subtidal chalk and subtidal coarse sediments; assumption that there would be no restriction on potting</li> <li>• Site management should include a no-trawl zone</li> <li>• No angling so no contention</li> <li>• Shrimp trawling occurs in the area</li> <li>• Current long-lining and netting would be compatible with designated features</li> </ul> <p>Concern if fishing activity is restricted to current levels: would be difficult for new starters in this industry</p> <p>There are also <i>Sabellaria spinulosa</i> reefs and other biogenic habitats</p>	<ul style="list-style-type: none"> <li>• What level of certainty is given regarding compatibility? Assumptions are not sufficient for making decisions that could affect many livelihoods.</li> <li>• ESFIC trawling restriction byelaw likely to be remain (but will be reviewed when ESFIC replaced with EIFCA)</li> <li>• Angling does occur, e.g. off Cromer pier and on beaches.</li> <li>• What is the compatibility of this activity with features?</li> <li>• Long-lining and netting compatibility was not fully checked at hub meetings because of a lack of time</li> </ul> <p>EIFCA to evaluate sustainability of all inshore fishing activities, including potting.</p>
<p>NG 2.3 Wash &amp; North West Norfolk inshore</p>	<p>Extent of intertidal habitats (BSH): 0.20 km<sup>2</sup> plus 1.62 km<sup>2</sup> intertidal biogenic reef</p> <p>HOCI:</p> <ul style="list-style-type: none"> <li>• Blue mussel beds: 1.77 km<sup>2</sup></li> <li>• <i>Sabellaria spinulosa</i> reef: 79.95 km<sup>2</sup></li> <li>• Seagrass beds: 6.84 km<sup>2</sup></li> </ul> <p>Additional considerations</p> <p>Management considerations</p> <p>How to decide on acceptable level or intensity of activity, e.g. potting/dredging</p> <p>Understood that potting and shrimping are compatible with the features</p> <p>General comment</p> <p>General comment</p>	<p>What are these and what is the compatibility of fishing and angling activities on them?</p> <p>The Wash alone contains &gt;300km<sup>2</sup> intertidal mudflats and sandflats. Where is the intertidal biogenic reef and what type of reef is it?</p> <p>ESFIC data:</p> <ul style="list-style-type: none"> <li>• Intertidal blue mussel beds: 3.92 km<sup>2</sup></li> <li>• <i>Sabellaria spinulosa</i> reef: &lt; 2.00 km<sup>2</sup></li> <li>• Seagrass beds – no evidence of these in the Wash</li> </ul> <p>Highly productive estuarine system Fish nursery area</p> <p>Site already heavily designated. Gap analysis for HOCI would identify that blue mussel beds, <i>Sabellaria spinulosa</i> reef and seagrass beds are features of the Wash &amp; North Norfolk Coast SAC: site fisheries (cockle and mussel) already heavily managed to protect mussel beds and <i>Sabellaria spinulosa</i> reef.</p> <p>Role for fisheries regulators, conservation advisors and fishing sector collectively. Much work already done, e.g. restricting cockle and mussel harvesting.</p> <p>Concern over assumption vs. definite position relating to compatibility of activities with features.</p> <p>Would this site be designated for BSH, HOCI, SOCI features or all/some of these? Management needs to be tailored to conservation of features for which site is designated.</p> <p>Not clear on boundary of this dMCZ in relation to NG 2.2 and NG 2.3</p>



Central Norfolk offshore	<p>Extent of intertidal habitats (BSH): 0.03 km<sup>2</sup></p> <p>Subtidal biogenic reefs: 33.72 km<sup>2</sup></p> <p>Compatibility of activities with site features:</p> <ul style="list-style-type: none"> <li>• Fishing activity should be allowed at current levels</li> <li>• It is understood the site is OK for potting and shrimping; there are already trawling restrictions in the area.</li> <li>• Sensitivity matrices suggest set nets, long-lines and pots are compatible with chalk features</li> </ul>	<p>Again, this seems low if this site includes coastline, which it appears to do.</p> <p>What type of reef is this and what dataset has provided it?</p> <ul style="list-style-type: none"> <li>• More certainty is needed</li> <li>• Comments as for NG 2.2</li> <li>• Compatibility with subtidal biogenic reefs?</li> </ul>
NG 2.5 Race Bank and further east	General comment	This site is beyond 6nm therefore limited comment from ESFJC. Area is important for juvenile crabs
NG 2.6 E of Inner Dowsing / Docking Shoal	General comment	This site is beyond 6nm therefore limited comment from ESFJC. There is no Docking Shoal SAC.
NG 2.7 Lincolnshire coast, Humber mouth to Chapel Point	<p>General comment</p> <p>Extent of intertidal habitats (BSH): 0.49 km<sup>2</sup></p> <p>HOCI:</p> <ul style="list-style-type: none"> <li>• <i>Sabellaria spinulosa</i> reef: 9.27 km<sup>2</sup></li> <li>• Subtidal biogenic reef (BSH): 0.43 km<sup>2</sup></li> </ul>	<p>Nearly all this site is within the Joint Committee's district (0-6nm), except for a small area.</p> <p>Seems low for a site that covers &gt;30km coast</p> <p>Where are these features? Data are at variance with ESFJC survey data. ESFJC currently working with NE/JNCC/CREL on <i>Sabellaria spinulosa</i> reef data.</p>

	<p>Compatibility of activities with site features:</p> <ul style="list-style-type: none"> <li>• Potential cockle fisheries should be allowed at current levels</li> <li>• Baitdigging and angling should be allowed at current levels</li> <li>• Shrimping and potting should be allowed at current levels; shrimping is understood to be compatible with site features</li> <li>• Potting and shrimping are compatible with BSH features, although management measures may still need to be considered</li> <li>• Fishing for flat fish: heavier gear – may need management measures or technical restrictions to ensure that activity achieves compatibility</li> </ul>	<ul style="list-style-type: none"> <li>• Currently Horseshoe Point cockle beds are closed but could re-open in future if stocks permit, and according to agreed management with Natural England wrt Humber European Marine Site</li> <li>• Is there information on current levels of bait digging and angling?</li> <li>• Pink-shrimping is not thought to be compatible with <i>Sabellaria spinulosa</i> reef</li> <li>• Compatibility information too vague</li> </ul>
<p>NG 2.8 North Lincolnshire offshore</p>	<p>General comment</p>	<p>Site mostly outside 6nm, therefore limited ESFJC comment. If these sites are both taken forward, suggest look at potential to put the small part of NG 2.8 that is within 6nm into the adjacent NG 2.7 site; and put the small part of NG 2.7 that is outside 6nm into the adjacent NG 2.8 site – would make management easier but would not change extent of designated areas.</p> <ul style="list-style-type: none"> <li>• Site selection must be based on firmer information, not assumptions about compatibility</li> </ul>
	<p>Compatibility of activities with site features:</p> <ul style="list-style-type: none"> <li>• Assumed commercial fishing and angling both compatible with features.</li> <li>• UK gear types and methods (benthic trawling) ... thought to be compatible with features</li> <li>• Assumed that pelagic fishing gear, and pink and brown shrimp trawling would be compatible.</li> <li>• Compatibility for cod trawling needs to be checked.</li> </ul>	



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

**Name** Dr Marcus Cross, ScottishPower Renewables  
**Sector represented** Offshore Renewables  
**Regional Hub** East of England

### Please explain briefly how the feedback you are presenting was collected:

- Discussions with colleagues within ScottishPower Renewables
- Discussions with other renewables industry developers
- Discussions with The Crown Estate

### Please indicate how many people you have been able to discuss this feedback with:

This feedback has been discussed with numerous ScottishPower Renewables colleagues, with colleagues in Vattenfall Wind Power Ltd, with other offshore wind developers in the NetGain region, with RenewableUK and other developers operating within the UK who represent their interests at other MCZ regional projects, and with The Crown Estate.

### For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

We are concerned that the renewables sector is under-represented at East of England hub meetings, considering the relative importance of the MCZ designation process to renewables interests in this area. In order to adequately collate views and opinions, we would recommend increased representation at future hub meetings, and if possible additional attendance from the sector at StAP meetings.

We would also like to see increased briefing of stakeholders at hub meetings on a) the key issues faced by each of the sectors involved, in order that proper awareness of the implications of proposing sites for designation is achieved, and b) the limitations of, and assumptions built into, the modelling outputs presented. We are further concerned that the use of sensitivity/compatibility matrices, without associated explanation of their purpose and limitations, leads to their misuse by the hub groups, and misleading results, and we would like to see this remedied in future hub meetings. We suggest a Natural England/JNCC representative details the scope of the matrix to the stakeholders at the next hub meetings, if the tool is to be used further.

The application of an index of support for each site is also misleading as it favours sectors with multiple representation, or those without wide reaching interests (and therefore more comfortable to pass judgement on areas that do not impact on their interests), and does not adequately take into account sectoral interests represented by a single individual. Moreover, the level of support assigned to a site following workshop discussions

can be skewed by the views expressed by a subset (e.g. one table within the workshop), and there does not seem to be a way to adequately capture and convey the overall level of support from the wider group.

The extent of the overlap between the hub areas is substantial and not fully understood by all the stakeholders and can result in insufficient representation and understanding of stakeholder concerns. We feel that the StAP is better placed to make decisions on what areas to be taken forward into consideration for the whole NetGain region.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.2			X	<p>This dMCZ should not to be designated as a reference site.</p> <p>There should be clarity on the mitigations required in relation to cabling through this dMCZ.</p>	<p>Potential impact on cable installation and maintenance during operation within MCZ. Any restriction to the operation / maintenance of cables is likely to have significant economic impacts. The assumption, which we support, is that cabling will be permitted through MCZs, with the possible exception of some reference sites, but we would like clarity on this, and on any potential mitigation that may be required.</p>	<p>Further clarification should be presented outlining the relationship between the dMCZ and Natura 2000 sites. In principle SPR supports the overlap of N2K sites with MCZs, provided this makes ecological sense. However, there must be clarity about the conservation objectives, management measures and any additional requirements that would accompany MCZ status, in order that these can be factored in to activities within existing N2K sites.</p>
NG2.3			X	<p>This dMCZ should not to be designated as a reference site.</p> <p>There should be clarity on the mitigations required in relation to cabling through this dMCZ.</p>	<p>Potential impact on cable installation and maintenance during operation within MCZ. Any restriction to the operation / maintenance of cables is likely to have significant economic impacts. The assumption, which we support, is that cabling will be permitted through MCZs, with the possible exception of some reference sites, but we would like clarity on this, and on any potential mitigation that may be required.</p>	<p>Further clarification should be presented outlining the relationship between the dMCZ and Natura 2000 sites. In principle SPR supports the overlap of N2K sites with MCZs, provided this makes ecological sense. However, there must be clarity about the conservation objectives, management measures and any additional requirements that would accompany MCZ status, in order that these can be factored in to activities within existing N2K sites.</p>

NG2.4		X	<p>This dMCZ should not to be designated as a reference site.</p> <p>There should be clarity on the mitigations required in relation to cabling through this dMCZ.</p>	<p>This dMCZ overlays part of a Round 2 wind farm so we would support it only should the site be clipped around the boundary of the wind farm, with a suitable buffer zone.</p> <p>Potential impact on cable installation and maintenance during operation within MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts. The assumption, which we support, is that cabling will be permitted through MCZs, with the possible exception of some reference sites, but we would like clarity on this, and on any potential mitigations that may be required.</p>	<p>Further clarification should be presented outlining the relationship between the dMCZ and Natura 2000 sites. In principle SPR supports the overlap of N2K sites with MCZs, provided this makes ecological sense. However, there must be clarity about the conservation objectives, management measures and any additional requirements that would accompany MCZ status, in order that these can be factored in to activities within existing N2K sites.</p>
-------	--	---	--	--	--

NG2.1	X	X	<p>Neutral: In general support of a large part of this dMCZ (overlap with the Outer Thames SPA) but not the section that overlaps the wind farm zone.</p> <p>Negative: There is a small area of overlap at the easterly boundary of this dMCZ and EAOW development zone (Zone 5).</p> <p>The dMCZ should be clipped to follow the boundary of the wind farm development zone, with a suitable buffer zone.</p>	<p>This dMCZ overlaps with EAOW development zone (Zone 5). Although supportive of the principle of overlaying existing Natura 2000 sites and dMCZs, this cannot be supported when there are overlaps with wind farm development zones. We could support this site if it was clipped to the wind farm zone boundary, with a suitable buffer zone.</p> <p>The socio-economic impacts of selecting an area for a potential MCZ within the EAOW development are significant, not least because of the impacts of an uncertain regulatory framework on investment, and potential delays in the planning and development processes. As other ecologically equivalent areas are available immediately outside the development boundary, then in line with the spirit of the primary legislation and published guidance, these would represent a more suitable selection.</p> <p>As the management policy and guidelines for the maintenance and protection of the MCZs are not yet decided, we must suggest that MCZs are located outside the boundaries of planned or constructed wind farm sites. Until there is absolute clarity and certainty about any additional constraints, data collection, mitigations and associated costs that MCZ status would indicate- even if the relevant authorities currently assess these to be minimal- there will be inevitable delay built into the planning and development stages of these projects.</p> <p>Although difficult to quantify the social, economic and environmental costs of delays/restriction of the EAOW projects, the development of Zone 5 will bring:</p> <ul style="list-style-type: none"> <li>• £21.6billion in capital investment</li> <li>• 5million households powered by renewable energy</li> <li>• £2.8billion a year in revenue from electricity generation</li> <li>• 10million tonnes of CO<sub>2</sub> reduction per annum</li> <li>• 240,000 tonnes of SO<sub>2</sub> reduction per annum</li> <li>• 72,000 tonnes of NO<sub>x</sub> reduction per annum</li> </ul> <p>The impacts of uncertainty, delay and restrictions are likely therefore to be significant and may jeopardise the UK's legally binding renewables and ambitious climate change emissions targets for 2020.</p> <p>In the rest of the dMCZ (outside the overlap with Zone 5 which we would like to see clipped) there are potential impacts on cable installation and maintenance during operation. Any restriction to the operation / maintenance of cables is likely to have significant economic impacts.</p>	<p>In principle SPR supports the overlap of N2K sites with MCZs, provided this makes ecological sense. However, there must be clarity about the conservation objectives, management measures and any additional requirements that would accompany MCZ status, in order that these can be factored in to activities within existing N2K sites. Given the absence of this clarity, we cannot currently support any dMCZ which overlaps with a wind farm zone, even if it is overlaying an existing N2K site.</p>
-------	---	---	--	---	--

2G <sup>1</sup>			X	Reduced impact on nationally important renewable energy developments compared to other BAIs whilst meeting the ENG guidance	None	This location has equal ecological value to BAIs 1B and 1E for subtidal sand and coarse sediment, but significantly less socio-economic impact, and should be taken forward
-----------------	--	--	---	---	------	---

---

<sup>1</sup> From Figure 1 in East of England Regional 3 Workshop report



2F <sup>2</sup>		X	Reduced impact on nationally important renewable energy developments compared to other BAIs, whilst meeting the ENG guidance	None	<p>We are concerned that in the EoE Regional Hub Meeting 3 Workshop Report it was argued that 2F has a lower level of additional ecological importance (compared to 2E, 2D, 2G, 1B and 1E) and although not stated we assume this is in relation to birds. With the exception of BAI 1B [that overlaps the Outer Thames Estuary SPA] we do not believe the evidence supports this statement.</p> <p>We are aware that the RSPB has provided the NetGain project team with some bird data (from the ESAS database) and that it is currently being analysed. The ESAS database is very large and detailed and interpretation of the data is a very complex problem that should not be attempted lightly. JNCC have reviewed this data<sup>3</sup> and <u>did not identify any areas of search in EoE hub area that could be considered as possible SPAs.</u> We believe that this report provides a scientific and robust assessment of the data using sound criteria for the assessment of ecological importance i.e. identification of ‘hotspots’ for key life –cycle stages.</p> <p>The conclusion must be that there is no scientific assessment that differentiates 2E, 2D, 2F, 2G or 1E based on their greater ornithological importance. Therefore if any of these BAIs is to be taken forward social and economic impacts must be taken into consideration and that therefore 1E should not be considered further.</p>
-----------------	--	---	--	------	--

<sup>2</sup> From Figure 1 in East of England Regional 3 Workshop report

<sup>3</sup> Kober K et al (2010) An analysis of the number and distribution of seabirds within the British Fishery limit aimed at identifying areas that qualify as possible marine SPAs. JNCC Report 431.

1E <sup>4</sup>	X		This BAI would have very significant negative impacts to offshore windfarm developments within Round 3 Zone 5.	<p>We strongly oppose further consideration of this BAI.</p> <p>The socio-economic impacts of selecting an area for a potential MCZ within the EAOW development are significant, not least because of the impacts of an uncertain regulatory framework on investment, and potential delays in the planning and development processes. As other ecologically equivalent areas are available immediately outside the development boundary, then in line with the spirit of the primary legislation and published guidance, these would represent a more suitable selection.</p> <p>As the management policy and guidelines for the maintenance and protection of the MCZs are not yet decided, we must suggest that MCZs are located outside the boundaries of planned or constructed wind farm sites. Until there is absolute clarity and certainty about any additional constraints, data collection, mitigations and associated costs that MCZ status would indicate- even if the relevant authorities currently assess these to be minimal- there will be inevitable delay built into the planning and development stages of these projects.</p> <p>Although difficult to quantify the social, economic and environmental costs of delays/restriction of the EAOW projects, the development of Zone 5 will bring:</p> <ul style="list-style-type: none"> <li>• £21.6billion in capital investment</li> <li>• 5million households powered by renewable energy</li> <li>• £2.8billion a year in revenue from electricity generation</li> <li>• 10million tonnes of CO<sub>2</sub> reduction per annum</li> <li>• 240,000 tonnes of SO<sub>2</sub> reduction per annum</li> <li>• 72,000 tonnes of NOx reduction per annum</li> </ul> <p>The impacts of uncertainty, delay and restrictions are likely therefore to be significant and may jeopardise the UK's legally binding renewables and ambitious climate change emissions targets for 2020.</p>	<p>Offshore wind farms are expected by the UK Government to play a significant role in meeting renewable energy targets to 2020 and beyond to 2050<sup>5</sup>. Projects leased under the Crown Estate's Round 3, are therefore considered to be of national significance- a fact recognised by their determination by the IPC and its successor, in accordance with National Policy Statements. Any delay to these projects, therefore, runs the risk of jeopardising renewable energy and climate change emissions reductions targets- having environmental, social and economic impacts at local, regional, national and even global level.</p> <p>The Marine and Coastal Access Act and the MCZ Project Delivery Guidance outline the key point "Where there is a choice of alternative areas which are equally suitable on ecological grounds, socio-economic factors could be more significant in deciding which areas may be designated as an MCZ", and a Ministerial Statement on the Creation of a Network of Marine Protected Areas (11th March 2010) states "In ensuring we create an ecologically coherent network, the Government wants to minimise any adverse social and economic impacts and wherever possible to work with the grain of sustainable economic use of the seas".</p> <p>We therefore oppose the further consideration of BAI 1E, on the grounds that there are significant socio-economic impacts of any designation within it, which are not evident in other areas of ecological equivalence which could be designated in line with the ENG criteria.</p>
<p><sup>4</sup> From Figure 1 in East of England Regional 3 Workshop report</p>					
<p><sup>5</sup> The UK National Renewable Energy Action Plan</p>					

1B <sup>6</sup>	X		<p>Negative impact to offshore windfarm developments and marine aggregates industries.</p> <p>Recommendation to clip boundary of proposed BAI to omit the Zone 5 area from the BAI, with a suitable buffer zone.</p>	<p>We oppose the consideration of this BAI, as it overlaps the EAOW wind farm zone (Zone 5).</p> <p>The socio-economic impacts of selecting an area for a potential MCZ within the EAOW development are significant, not least because of the impacts of an uncertain regulatory framework on investment, and potential delays in the planning and development processes. As other ecologically equivalent areas are available immediately outside the development boundary, then in line with the spirit of the primary legislation and published guidance, these would represent a more suitable selection.</p> <p>As the management policy and guidelines for the maintenance and protection of the MCZs are not yet decided, we must suggest that MCZs are located outside the boundaries of planned or constructed wind farm sites. Until there is absolute clarity and certainty about any additional constraints, data collection, mitigations and associated costs that MCZ status would indicate- even if the relevant authorities currently assess these to be minimal- there will be inevitable delay built into the planning and development stages of these projects.</p> <p>Although difficult to quantify the social, economic and environmental costs of delays/restriction of the EAOW projects, the development of Zone 5 will bring:</p> <ul style="list-style-type: none"> <li>• £21.6billion in capital investment</li> <li>• 5million households powered by renewable energy</li> <li>• £2.8billion a year in revenue from electricity generation</li> <li>• 10million tonnes of CO<sub>2</sub> reduction per annum</li> <li>• 240,000 tonnes of SO<sub>2</sub> reduction per annum</li> <li>• 72,000 tonnes of NO<sub>x</sub> reduction per annum</li> </ul> <p>The impacts of uncertainty, delay and restrictions are likely therefore to be significant and may jeopardise the UK's legally binding renewables and ambitious climate change emissions targets for 2020.</p> <p>SPR strongly suggests that BAI 1B should be removed and not taken forward for further consideration. At the very least, we suggest that this BAI should be clipped around the boundary of the wind farm, with a suitable buffer zone.</p>	<p>Offshore wind farms are expected by the UK Government to play a significant role in meeting renewable energy targets to 2020 and beyond to 2050<sup>7</sup>. Projects leased under the Crown Estate's Round 3, are therefore considered to be of national significance- a fact recognised by their determination by the IPC and its successor, in accordance with National Policy Statements. Any delay to these projects, therefore, runs the risk of jeopardising renewable energy and climate change emissions reductions targets- having environmental, social and economic impacts at local, regional, national and even global level.</p> <p>The Marine and Coastal Access Act and the MCZ Project Delivery Guidance outline the key point "Where there is a choice of alternative areas which are equally suitable on ecological grounds, socio-economic factors could be more significant in deciding which areas may be designated as an MCZ", and a Ministerial Statement on the Creation of a Network of Marine Protected Areas (11th March 2010) states "In ensuring we create an ecologically coherent network, the Government wants to minimise any adverse social and economic impacts and wherever possible to work with the grain of sustainable economic use of the seas".</p> <p>We therefore believe BAI 1B should be removed from consideration, on the grounds that there are significant socio-economic impacts of any designation within it, which are not evident in other areas of ecological equivalence which could be designated in line with the ENG criteria.</p>
-----------------	---	--	--	---	---

<sup>6</sup> From Figure 1 in East of England Regional 3 Workshop report

<sup>7</sup> The UK National Renewable Energy Action Plan

## General comments

### 1) The economic and environmental impacts of proposing BAIs in areas 1E and 1B.

The above feedback form identifies some major concerns, particularly with the proposal of two of the BAIs in this 2<sup>nd</sup> iteration, which reflect wider aspects of the MCZ designation process to date.

Our serious concern is based on the fact that high-value, nationally significant projects like the East Anglia Offshore Wind development project (in The Crown Estate's Round 3 Zone 5) require a stable, well understood regulatory environment which provides the required level of confidence within which investments can be justified and approved. A lack of clarity in terms of the regulatory environment, or other areas of potential uncertainty, only act to increase risk, rendering investment decisions more difficult or in the worst case undermining them completely. Although the principle of co-locating some MCZs with wind farms is to be supported, this can only be achieved when the conservation objectives, management measures, and all associated requirements are established and clear to all, including those involved in planning determinations and enforcement (such as the IPC, MMO and consultees).

Offshore wind farms are expected by the UK Government to play a significant role in meeting renewable energy targets to 2020 and beyond to 2050<sup>8</sup>. Projects leased under the Crown Estate's Round 3, are therefore considered to be of national significance- a fact recognised by their determination by the IPC and its successor, in accordance with National Policy Statements. Any delay to these projects, therefore, runs the risk of jeopardising renewable energy and climate change emissions reductions targets- having environmental, social and economic impacts at local, regional, national and even global level.

The Marine and Coastal Access Act and the MCZ Project Delivery Guidance outline the key point "Where there is a choice of alternative areas which are equally suitable on ecological grounds, socio-economic factors could be more significant in deciding which areas may be designated as an MCZ", and a Ministerial Statement on the Creation of a Network of Marine Protected Areas (11th March 2010) states "In ensuring we create an ecologically coherent network, the Government wants to minimise any adverse social and economic impacts and wherever possible to work with the grain of sustainable economic use of the seas".

We strongly suggest that the very significant impacts on the offshore wind developments proposed for Round 3 Zone 5 indicate that BAI 1E should be immediately removed from further consideration, and BAI 1B should either be entirely removed from consideration, or at the very least clipped to omit the windfarm development (including a suitable buffer zone). This can be justified as there are adequate alternative areas of ecological equivalence that can be considered (including areas 2G and 2F) should there be a need to bring in these Broad Scale Habitats to meet adequacy targets. There would be significantly lower socio-economic impacts from designating MCZs within these areas, and their designation would not run the risk of jeopardising 2020 renewable energy and climate change targets, so they should be prioritised above areas 1B and 1E should additional habitat be required.

### 2) Minimum and maximum targets

A key area for future discussion is the amount of Broad Scale Habitat that is required to meet targets. The area required varies greatly depending on whether minimum or maximum targets are to be achieved. Given the inadequacies of the underlying data, we strongly recommend that the aim is for the minimum target to be met first, through the designation of MCZs on which there is consensus, including (where appropriate) the existing SPA/SAC network. As data becomes increasingly adequate over time, the network can expand towards upper targets, provided there is consensus on sites. This seems a more logical way to proceed than striving to identify the maximum possible area for designation and management when there is widespread agreement that the data is often inadequate, and there are conflicts between socio-economic and conservation goals for the region which may arise purely as a result of seeking to maximise targets at an early stage. There may, for example, be no need to consider the BAIs put forward in the 2<sup>nd</sup> iteration, within some of which there are significant socio-economic issues, if lower targets are accepted as a sensible starting point for the MCZ network.

### 3) Additional Areas of Eligible Habitat

---

<sup>8</sup> The UK National Renewable Energy Action Plan

A related issue is the identification of any alternative areas for consideration that may be required once targets are clarified. There are areas of habitat within the East of England hub area, in addition to the currently identified BAIs, that would be capable of meeting the ENG criteria. These should not be excluded from future consideration, if targets dictate that additional habitat, over and above the dMCZs, should be identified. It should be remembered that the outputs from the 2<sup>nd</sup> iteration process represent one scenario identified from one analysis of the data and workshop discussions on some, but not all, of the socio-economic impacts. If necessary, the data analysis process should be re-run to identify these areas, and properly account for socio-economic factors in all ENG-compliant areas of interest. Only in this way would the most appropriate MCZs, justifiable in environmental, social and economic terms, be identified.

#### **4) Natura 2000 as part of MCZ network**

There must be further clarity also on the extent to which the Natura 2000 network provides a core part of the MCZ network, through the overlaying of MCZ designation on existing SPA/SAC designations. JNCC and Natural England believe that this approach is a good one, where MCZs habitats lend themselves to co-location with N2K sites. If this is encouraged as a preferred option, there must be greater guidance to the project teams and stakeholders on this issue. It appears that the 2<sup>nd</sup> iteration proposals may have excluded SAC (but not SPA) sites from the site identification work, and we would like to see much greater clarity around this. Clearly the inclusion or otherwise of N2K sites within the MCZ has a significant impact on the amount of additional habitat that would require MCZ designation to reach targets, once finalised.

#### **5) Sensitivity / Compatibility Matrix**

Insufficient guidance and explanation has been provided alongside the use of the sensitivity matrix to date, to the extent that it has been referred to as the 'compatibility' matrix within stakeholder discussions. SPR believes the matrix has been inappropriately used, and the results over-interpreted, and that this has resulted in mistaken assumptions about the compatibility of certain activities with underlying habitats. Analysis by the Crown Estate has identified that in almost every instance, habitats which have been identified are 'sensitive' to the activities associated with offshore wind farms, including cabling. Yet, should the category 'energy production at sea (wind turbines)' be used alone (that is, in isolation from the other categories associated with windfarms, namely infrastructure (offshore wind) and cabling) the matrix determines it to be 'compatible' with subtidal sand and coarse sediments. This is not likely to be the case, and we believe it may have misinformed the proposal of BAI 1E from the workshop.

Moreover, Stakeholders and Netgain should not assume that cabling is compatible with MCZs as the sensitivity matrix indicates otherwise for most BSH and FOCI and offshore wind farm consenting experience highlights that the presence of national environmental designations are likely to be additional mitigation requirements for developers. Clarity needs to be provided on the level of mitigation that would be required for each BSH and FOCI before stakeholders and the project team make any assumptions informing decisions on locations of MCZs and subsequent management measures.

Should the matrix continue to be used by the hub groups, it must be accompanied by appropriate training and briefing of stakeholders who use it, and its limitations must be recognised. SPR suggests that a Natural England or JNCC representative may be best placed to provide these details on the scope of the matrix tool to the stakeholders at the next hub meetings, if it is to be used. However, we feel that the use of this tool falls more appropriately into the remit of the StAP.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG

Recreational Sea Angling comments from stakeholders were collected by Net Gain staff attending the North East Sea Angling and Boat Show, Nissan Centre, Sunderland on the 13<sup>th</sup> & 14<sup>th</sup> November 2010.



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name Sophie Barrell .....

Sector represented Offshore Wind, specifically Forewind Dogger Bank Offshore Wind Farm.....

Regional Hub North East.....

### North East Hub report specific feedback:

Having participated in both days of the North East hub workshop in Blyth I am concerned by the reporting of some of the information in the hub report. The following comments highlight specific areas of concern which I would like to be corrected or addressed, particularly as this is a record of our involvement in this stakeholder led process. These comments largely relate to section 9 of the hub report.

Discussion on sites 3A, 2B, 1B and 3C, paragraph 3: A note is made in the report that 'the potential for future restrictions based on existing quotas raised some concerns'. Whilst this was the case Group 3 responded by noting that in table discussions we had specifically asked for a caveat to be passed on with this site that due to the apparent low levels of fishing in the area we felt that the effort was low enough not to be of significant threat to the habitat and therefore should be allowed to continue at its current level. It was also for this reason that the strip had been left out of this proposed MCZ by table 3 as it was recognised that this area was more intensively fished and hence should not be included in the designation. It is also then noted that management measures need consideration but it is not recognised that these measures as proposed by Group 3 were suggested to the hub.

There is mention further down in the discussion of these sites (mentioned above) of a Group 4 – there was no group 4, only 3 tables. Please correct to confirm which group made this comment. Further to this, there is a comment noted in the second to last paragraph on the same page about the importance of the Farnes. This comment does not fit into discussions around these sites but should instead be put elsewhere.

I would like to see the final comment in discussion of this area altered. At present the report reads that 'discussion suggested that this may not be necessary' in reference to the request for consideration of a 500m buffer between the MCZ and the wind farm zone. I would like it noted that this comment is not representative of the view of the wind farm industry and does not accurately reflect proceedings on the day. I was not able to further explain the justification for this request and felt that I was not given the opportunity to

do so by other stakeholders present at the event. The suggestion that this was 'not necessary' does not fit with an informed understanding of the processes necessary to consent an offshore wind farm and that adequate discussion was not had to come to this sort of conclusion. If an MCZ site abuts an area being assessed for development there may be need to assess the MCZ area in greater detail and therefore surveys will need to be extended at significant increased costs to cover this area. Introducing a buffer between the two sites would potentially mean that extensions of such in depth surveys may not be necessary due to decreased likelihood of impacts on the MCZ from wind farm development and hence survey costs would not be expected to increase. Therefore, Forewind, as an offshore wind farm developer, would like it noted that we disagree with the statement that such a buffer may not be necessary and will re-address this at the next hub if this site is considered further.

Discussions around sites 2F, 2E and 1C noted the objection from Forewind to the site within the offshore wind farm zone. Whilst no objection was noted to sites 2E or 1C according to the report, Forewind would like it noted that this is not an indication of support for either of these sites. If there is a requirement for one of the three sites considered to cover the Broad Scale Habitat (BSH) targets then 2E and 1C would be preferential to 2F but Forewind can still not support these designations at this stage due to the ongoing uncertainty surrounding cabling restrictions and management and the potential associated cost implications. If these costs become too high they could make wind farm development financially unviable. For these reasons Forewind cannot support the designation of site 1C and BAI 2E unless clarity on management measures and potential mitigation requirements can be provided to allow better understanding of the implications of such a designation. Furthermore, I would like to see in future that a lack of agreement to a site is also noted as these can be as important as specific objections.

In discussion of the sites above, the report notes that Group 3 commented on the lack of confidence in the data which could lead to designation in the wrong places. Forewind would also like to see the addition to this, as mentioned at the hub, that sites could be being designated for the wrong BSH. The paragraph below then goes on to comment that both oil and gas and renewables were happy with the approach to merge sites 1C and 2E. Please adjust this comment – there were no representatives from the oil and gas industry at this hub meeting and there is significant oil and gas interest in this area so it could be very damaging for the oil and gas industry if there was an assumption from this that they were represented at the hub. Furthermore, whilst I was happy with the approach to merge the sites 1C and 2E for further consideration this was not an indication of support for this site but rather the methodology being used to assess it. Forewind are unable to support designation of this site until further information can be provided on management measures and potential mitigation requirements are better understood.

Conclusions on sites 1A, 2A, 2H and 3D note caveats for the site going forward. Forewind would like to see the caveat that cabling should be allowed also added to this list to highlight the potential significance of not allowing this activity in the area. This caveat was also identified on the day and Forewind would like to see this reflected in the main report.

I am concerned about the feedback given to Cleveland Potash Mine from the hub meetings and feel that further consideration was given to this than appears to have been reported to the company. As a hub we did not decide that it should not be an issue to place sites on top of the area impacted but that appropriate caveats should be put in place on any sites in the potentially affected area to allow the mining activity to continue. I am also concerned at the way that the company is being consulted outside of the managed process and feel that in future representations should be made in person at the hub. There are other industries which are not being consulted in this way and have not been involved in the process so it seems unfair to make special allowances for one stakeholder. Furthermore, attendance at the hub in person would mean that miscommunications such as these would not occur.

## **2<sup>nd</sup> Iteration report specific feedback:**

Forewind would like to make the following requests for changes to the Netgain 2<sup>nd</sup> Iteration Submission to the SAP:

- General – Forewind is of the opinion that comments relating to the offshore wind farm industry have not been captured to the same extent as those relating to the fishing industry and would like to see this adjusted to ensure the opinions of the offshore wind farm industry are also captured.



- General – Forewind are concerned over the significant differences in the levels of information provided for each site and would like to see as much information passed through from the hubs to the SAP as possible on each dMCZ.
- General – Forewind would like to see the comments and caveats on cabling that were established at each hub passed through to this report more strongly to reflect the potential implications of cabling restrictions on the offshore wind farm industry.
- General – Forewind are concerned by the following statement which occurs on several occasions within the report: ‘On the basis that co-location of windfarms with MCZs is confirmed as being acceptable (as regards the underlying BSH features) the consensus was that the site could go forward’. Bearing in mind the current level of uncertainty amongst the offshore wind farm industry on the potential level of management measures and mitigation implications of co-location, Forewind consider it inappropriate to put forward sites on such a basis as the offshore wind farm industry may not be able to alter its position in this respect. If that was the case these sites would continue to be highly contentious and hubs may have lost the opportunity to find alternative sites by assuming these sites would be suitable.
- Page 13, para 3. Forewind would like to see ‘All of the dMCZs were submitted with support from the Hub members’ changed to ‘All of the dMCZs were submitted although with varying levels of support from the Hub members’
- Page 14, para 1. ‘At this stage, we have not fully assessed which of these activities may or may not be compatible with the dMCZ features, and therefore what condition the sites are likely to be in’ – Forewind do not think that such assessments should be made at any stage by the hubs or by Netgain. The only way to make such assessments accurately is through data collection on site and anything else would be merely speculation and therefore Forewind would like to see this comment removed. Anthropogenic impacts can vary considerably between one area and seabed type and the next and hence such judgements should be withheld prior to data collection.
- Page 23, table 5. Forewind are concerned by the categories ‘windfarm’ and ‘wind turbines’ and would like clarification of the definition of the two terms. This could, perhaps, be better broken down to; consented wind farm, consented under construction wind farm, in planning Round 2 wind farm, in planning Round 3 wind farm, operational wind farm, identified potential wind farm cable corridor.
- Page 33, end. Forewind would like to see the addition of an acknowledgement that offshore wind farm activities are critical in the area and hence management measures should not restrict such activities (including cabling) and should not impose extra requirements on consented sites.
- Page 38, para 4. ‘May be a reference site’ – Forewind are concerned at this statement as no guidance has been provided on how these sites will be selected and hence are worried at the weight stakeholders may be applying to some of the data provided. As this site overlaps part of an offshore wind farm site, Forewind are concerned that such a statement is made without the understanding of the activities required for operation and maintenance of a wind farm and that these may not tie in with the strict management measures of a reference site.
- Page 53, end. Forewind would request that a note is made of the importance of this area as a potential cable landfall location for the Dogger Bank offshore wind farm Project 1 as identified in the scoping report recently submitted to the IPC. Any cabling restrictions in this area would have significant implications for this project and could make it financially unviable.
- Page 55, para 3. ‘Maintain feature’ – Forewind are concerned that there may not be a suitable level of understanding amongst stakeholders of the implications of such potential management measures and that maintaining features may potentially require significant management. It would be helpful for NE and JNCC to provide information on conservation targets such as these and the typical level of management that may be required for this. Similarly, this comment extends to page 66, para 2 ‘achieve favourable conservation status’.
- Page 60, para 8. Forewind are concerned that Cleveland Potash Ltd. appear to be being consulted outside the main hub process and would like to question whether this is appropriate. Other stakeholders are not consulted in the same way if they are unable to attend and Forewind feel that should the mine wish to make stronger representation it would be more appropriate for them to do so by sending a representative to hub meetings. It is arguable that insufficient consideration has been given to the potential impacts of MCZs on a number of other industries and hence feel that this could also be represented in the report in the same way to ensure a balance report is presented to the SAP.
- Page 64, para 8. ‘One company already has a development to the north of the site’ – If this comment refers to the Round 3 Dogger Bank offshore wind farm zone this comment could be better explained by replacing with the following: ‘there is a large area to the north of the site for which the Crown Estate has awarded an agreement for lease to develop up to 12.8GW of offshore wind – equating to approximately 2,500 wind turbines with the potential to provide 10% of the UKs energy requirements.

- Page 65, para 3. Forewind would suggest that insufficient data was presented to indicate that this area is any more important for gannet and kittiwake than any other under consideration (particularly in this part of the North Sea) and would therefore request the removal of birds from the dMCZ designation of NG2.18 if such evidence cannot be provided. This comment applies to many other sites where there is a suggestion that bird species are an important feature and Forewind would like to express concern at adding bird designations to MCZs without sufficient supporting evidence.
- Page 66, end. As noted for the North East hub report, Forewind would like to see the comment 'The oil and gas and renewable energy sectors were happy with the site as proposed' removed from the report. **There were no representatives from the oil and gas sector at the meeting.** Furthermore, it should be noted that the support for the methodology to merge sites did not represent support from Forewind for the site itself. However, it can be noted that Forewind would prefer this site over the BAI above it but still have significant concerns over the potential associated management and mitigation restrictions for cabling.
- Page 68, para 3. Forewind would also request that the list of activities should include the NAREC project for which further information is being requested by Netgain. This project is key for the future of offshore wind development in the UK and hence the comments at the hub noted that this project should be considered.
- **Page 71**, comments on white-beaked dolphin, the sediment being mud rather than sand and the geological feature of importance. Forewind's understanding from the hub is that these comments actually applied to the original site 3B which went on to become site NG2.21 **NOT** site NG2.20 and would therefore ask Netgain to clarify and correct this.
- **Page 73**, end. Forewind understood, from the hub meeting, that this site was important for white-beaked dolphins **NOT** harbour porpoise and would request that Netgain check comments on sites NG2.20 and NG2.21 as we are very concerned over the potential mistakes appearing in information transfer from hub to regional reports.
- Page 77, end. Forewind would request that a note is made of the requests by the offshore wind farm industry to include a buffer between the offshore wind farm zone and the dMCZ in line with the comment made above on the hub report.

**Forewind have significant concerns over the apparent misreporting of comments from the hubs as well as the apparent lack of consistency between hub and regional reports and would like to see these concerns addressed prior to the SAP submission. These reports will form key tools to note stakeholder concerns as the process goes forward and hence it is crucial that they are accurate and truly representative of the workshops.**

#### **Forewind general comments:**

Forewind have a number of concerns with the process of MCZ designation which we would like to convey here to ensure that these are recorded correctly.

Many of the stakeholders at the regional hub meeting shared significant concerns over the quality of the data being used to designate the dMCZs and Forewind would like to reiterate this concern. In particular, we feel that this puts significant doubt on the outcomes of the process and on any dMCZs drawn at the hubs and later taken forward for designation. This concern was also present for the Features of Conservation Importance (FOCI) data which are, in a number of instances, obviously showing only records where surveys have been undertaken such as for oil and gas pre-construction surveys. Basing additions to designations on this information therefore stimulates considerable questions on whether this FOCI is actually an important feature in the designated region or whether it may, in fact, appear across the wider region. Forewind are very worried, as a result, that designation for these FOCI is being added to other sites in an inappropriate manner. Certainly discussions with some of the stakeholders at the hub meetings suggested that the Ocean Quahog (*Artica islandica*) is a wide spread species, found across the Central North Sea and not in the limited areas suggested by the FOCI data.

A review of the Sensitivity Matrix used by Netgain indicates that the majority of BSHs and FOCI that have been identified in each dMCZ are sensitive to activities related to offshore wind farm development. The potential restrictions, management measures and mitigation requirements which may therefore be associated with these designated areas presents a major concern for Forewind and to a number of other offshore wind farm developers (as noted through discussions within the industry, facilitated by RenewableUK). Whilst there are still such large uncertainties in this respect it is not possible for Forewind to support the principle of co-location at this time and hence cannot support a large number of the proposed designations based on the potential impacts to Forewind and potential impacts to other offshore wind farm developers (as noted through discussions within the industry, facilitated by RenewableUK). Site specific comments are addressed in the table below.

A particular concern for Forewind are the potential management and mitigation measures associated with cabling bearing in mind the nature of the process by which Forewind are provided with grid connection points and hence are restricted to a certain extent to particular cable routes. Further information on what mitigation may be expected for cabling through specific habitat types may help the industry to provide more information to the Impact Assessment process which will eventually allow for a better understanding of the proposed designations on the offshore wind farm industry. Cabling is a very important part of the construction and operation of offshore wind farms. For the current Round 3 process grid connections are offered to developers by National Grid in locations that are available to accommodate or extend to accommodate the extra capacity required. As a result the developer has no choice over the grid connection. The costs of cabling are high and hence the developer will always aim to take the most direct and feasible (in an engineering sense) route from the project to the connection point. Longer routes can add significant increases in cost and hence could risk the financial viability of the project as a whole. Consequently management measures for cabling activities should be carefully considered to ensure that they do not present a significant risk for the development of offshore wind energy that is crucial to meeting the UK's renewable energy targets and targets for CO<sub>2</sub> emission reductions.

The use of the sensitivity matrix at the hub meetings has also been noted as a concern for Forewind and as an issue for the hubs as a whole. Recent discussions with JNCC and Natural England (facilitated by RenewableUK) have suggested that this matrix is only an indication of sensitivity and, crucially, not of compatibility. It is felt that this was not explained well at the hub meetings and hence may have resulted in a misinterpretation by stakeholders that the matrix indicated activities that were not compatible. As a consequence this potentially calls the entire 2<sup>nd</sup> iteration into question as a number of areas were discounted as potential MCZs at an early stage due to concerns over the implications of the matrix. Forewind would suggest that proper training is provided at the start of the 3<sup>rd</sup> iteration on the use of this matrix and how it may relate to eventual management measures. In particular Forewind would like to see guidance from JNCC and NE provided to Netgain and the hubs on this issue to aid the 3<sup>rd</sup> iteration workshops.

The current process for designating reference sites amongst the dMCZs is not at all clear and Forewind would like to see this clarified as soon as possible. The offshore wind farm industry will have to maintain its current position on co-location whilst this is the case as the indications so far suggest that cabling, and development generally, will not be possible in such areas. Forewind will also have difficulty in supporting any site within potential cable corridors whilst this uncertainty remains. Should these present cabling restrictions if they are put forward as reference sites this could make a project financially unviable as explained above. As a result, Forewind would like to see confirmation prior to the next round of iterations on how these sites will be selected, the likely size and how stakeholders will continue to be consulted in designating these.

Netgain's approach to merging outputs from hub iterations is currently another area of concern for Forewind and for a number of other offshore wind farm developers (as noted through discussions within the industry, facilitated by RenewableUK). During single hub iterations certain areas are intentionally avoided through discussions at the workshops as areas of concern. Forewind is of the opinion that the current process to bring individual hub outputs together ignores such key discussions and therefore risks suggesting designations in areas which have been ruled out by one hub as a result of valid concerns without that hub having the opportunity to put forward its own opinions. A methodology to address this would be welcomed in the process. If it is not possible to provide such a solution Forewind will continue to hold concerns on the MCZs put forward in overlapping hub areas.

Forewind would like to suggest that one-to-one sessions should be considered for future regional hub meetings to follow group and/or plenary discussions. The current system for gauging support for a site amongst stakeholders at the workshops does not capture the full range of views held by a group. For example, if 5 out of 7 stakeholders on a table support a designation whilst the other two are opposed to the site, a record will be made that the site was supported or strongly supported. The views of the other two stakeholders are not being consistently captured in the hub reports. As this process is critical for stakeholders to ensure that their views are passed on to Natural England and JNCC for further consideration Forewind suggest that another approach needs to be instigated to address this. Forewind also believe that one-to-one sessions would give stakeholders an opportunity to ensure that their views are accurately captured to be subsequently incorporated into the hub outputs.

Forewind would like to request that clarity is offered on the situation of the Dogger Bank pSAC and its inclusion in the gap analysis used for the second iteration at the next round of hub meetings. At the second iteration workshops we were incorrectly informed that the reason for its exclusion was due to its status as a potential SAC as opposed to the correct reasoning – that it was still awaiting further information regarding the area of subtidal sand and the management measures.

The opinions of Forewind and, of some members of the offshore wind farm industry (as noted through discussions within the industry, facilitated by RenewableUK) on the individual sites are detailed in the table below. The values and statistics provided for various projects are those which have been provided by The Crown Estate to Netgain for input into the Impact Assessment and Forewind would like to emphasise that individual developers may provide their own values for these at a later stage in the process. These are not necessarily the views of individual developers who may choose to submit their own information at a later stage, but do provide indicative values for consideration. Forewind would like to emphasise the request below to allow a buffer zone of between 500m and 1km between designated sites and offshore wind farm areas. Such a buffer zone would potentially ease the pressures potentially associated with such a designation on an offshore wind farm site and the requirements of any Environmental Impact Assessment (EIA) for further survey work to assess impacts on bordering sites.

Please explain briefly how the feedback you are presenting was collected:

This feedback provides the results of meetings and discussions internally, within Forewind, as well as through discussions with other members of the offshore wind farm industry, RenewableUK and The Crown Estate.

Please indicate how many people you have been able to discuss this feedback with:

As noted above, this response is presented following conversations with a number of individuals in the offshore wind farm industry, primarily facilitated by RenewableUK as well as a number of discussions with individual representatives from other developers.

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

As discussed above, Forewind would welcome training on the use of the sensitivity matrix as well as the potential for one-to-one sessions to ensure that all stakeholder opinions are accurately recorded and presented within hub outputs.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.22	X			Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.	Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which could cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):  £27billion in capital investment 6.2million households powered by renewable energy £3.5billion a year in revenue from electricity generation 13million tonnes of CO2 reduction 300,000 tonnes of SO2 reduction 90,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets	Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.  <b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear.</b>
NG2.21			X			Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.
NG2.20			X			Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.

NG2.19	x		<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p>	<p>The following activities may impact on the site and may be restricted:</p> <p>Overlays the E.ON Climate &amp; Renewables Blyth Wind Farm which may cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£12million in capital investment</li> <li>2,800 homes powered by renewable energy</li> <li>£1.6million a year in revenue from electricity generation</li> <li>5,700 tonnes of CO2 reduction</li> <li>130 tonnes of SO2 reduction</li> <li>40 tonnes of NOx reduction</li> <li>Jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays Blyth NAREC Demonstration Wind Farm which has major implications for development of Round 3. This site is where technology will be tested.</p> <p>Cabling likely to be required for the NAREC project and the unknown management implications are a concern to industry.</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
BAI (2F) Reserve Choice (North Hub)	x		<p>Request to prioritise other BAIs. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.</p> <p>The BAI to the south of NG2.18 meets the ENG target and would be a preferable BAI to put forward.</p>	<p>Overlays part of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£27billion in capital investment</li> <li>6.2million households powered by renewable energy</li> <li>£3.5billion a year in revenue from electricity generation</li> <li>13million tonnes of CO2 reduction</li> <li>300,000 tonnes of SO2 reduction</li> <li>90,000 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul>	<p>If new data provided by fisheries interviews identifies MCZ 4D as highly fished there is potential to designate this alternative reserve area. This is a significant concern and Forewind request that alternative BAIs be prioritised.</p>

NG2.18 (North)	x			Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.	<p>Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£27billion in capital investment  6.2million households powered by renewable energy  £3.5billion a year in revenue from electricity generation  13million tonnes of CO2 reduction  300,000 tonnes of SO2 reduction  90,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
NG2.17 (Yorkshire and Humber Hub)	x			Request to avoid Forewind Project 1 cable corridor search area (recently supplied to Netgain) and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.	<p>Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£27billion in capital investment  6.2million households powered by renewable energy  £3.5billion a year in revenue from electricity generation  13million tonnes of CO2 reduction  300,000 tonnes of SO2 reduction  90,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
NG2.16 (Yorkshire and Humber Hub)	x			Request to avoid Forewind Project 1 cable corridor search area (recently supplied to Netgain) and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.	<p>Overlays <b>Forewind Dogger Bank Round 3 Wind Farm cable corridor</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <p>£27billion in capital investment  6.2million households powered by renewable energy  £3.5billion a year in revenue from electricity generation  13million tonnes of CO2 reduction  300,000 tonnes of SO2 reduction  90,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
NG2.15 (Yorkshire and Humber Hub)	x			Request for an assumption in the MCZ narrative to state Potash mining activities would not require restriction	<p>Unclear if Potash would require additional management measures</p> <p>Cables/Pipelines</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p>

NG2.14 (Yorkshire and Humber Hub)			x			Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.
NG2.13 (Yorkshire and Humber Hub)	x			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs being protected.</p>	<p>Abuts with the border of <b>Zone 4 Hornsea Round 3 Wind farm</b> likely to require cables in this area. An MCZ bordering the wind farm in this area will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <p>£12billion in capital investment  2.8million households powered by renewable energy  £1.6billion a year in revenue from electricity generation  5.7million tonnes of CO2 reduction  130,000 tonnes of SO2 reduction  40,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b></p>
NG2.12 (Yorkshire and Humber Hub)	x			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area and to avoid impact on Round 2 sites Humber Gateway and Westmost Rough.</p>	<p>Crucial area for cable landfall; overlays <b>Zone 3 Forewind Dogger Bank Round 3 Wind Farm cable corridor</b> which <b>require connection to the grid along this coast and</b> will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£27billion in capital investment  6.2million households powered by renewable energy  £3.5billion a year in revenue from electricity generation  13million tonnes of CO2 reduction  300,000 tonnes of SO2 reduction  90,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b></p>



<p><b>BAI Large area specifically: 2B,2D,2C, 1H, 1B and 1G Reserve Choice (Yorkshire and Humber Hub)</b></p>	<p>X</p>		<p>Request to prioritise other BAIs. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.</p>	<p>Overlays <b>Zone 4 Hornsea Round 3 Wind farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£12billion in capital investment</li> <li>2.8million households powered by renewable energy</li> <li>£1.6billion a year in revenue from electricity generation</li> <li>5.7million tonnes of CO2 reduction</li> <li>130,000 tonnes of SO2 reduction</li> <li>40,000 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Centrica Round 2 Race Bank Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£1.86billion in capital investment</li> <li>430,000 households powered by renewable energy</li> <li>£240million a year in revenue from electricity generation</li> <li>890,000 tonnes of CO2 reduction</li> <li>21,000 tonnes of SO2 reduction</li> <li>6,200 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Warwick Energy Round 2 Dudgeon Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£1.68billion in capital investment</li> <li>390,000 households powered by renewable energy</li> <li>£220million a year in revenue from electricity generation</li> <li>800,000 tonnes of CO2 reduction</li> <li>19,000 tonnes of SO2 reduction</li> <li>5,600 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <ul style="list-style-type: none"> <li>£945million in capital investment</li> <li>220,000 households powered by renewable energy</li> <li>£120million a year in revenue from electricity generation</li> <li>450,000 tonnes of CO2 reduction</li> <li>10,000 tonnes of SO2 reduction</li> <li>3,100 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul>	<p>Current support level indicated as mixture of 'supported' and 'against' by stakeholders in 2<sup>nd</sup> iteration. Forewind suggest this is amended to Against.</p>
--	----------	--	---	--	--

<b>NG2.11 (Linc Hub)</b>	x			Request to avoid Zone 4 Round 3 Windfarm Site and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.	Overlays <b>Zone 4 Hornsea Round 3 Wind farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):  £12billion in capital investment 2.8million households powered by renewable energy £1.6billion a year in revenue from electricity generation 5.7million tonnes of CO2 reduction 130,000 tonnes of SO2 reduction 40,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets	Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.  <b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b>
<b>NG2.10 (Linc Hub)</b>	x			Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.	Overlay area potentially required for <b>Zone 4 Hornsea Round 3 Wind farm</b> cables which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):  £12billion in capital investment 2.8million households powered by renewable energy £1.6billion a year in revenue from electricity generation 5.7million tonnes of CO2 reduction 130,000 tonnes of SO2 reduction 40,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets	Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.  <b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b>

NG2.9 (Linc Hub)	x			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p>	<p>Note from the 2nd iteration report 'Cabling is not likely to be compatible with the site features'.</p> <p>Overlay area potentially required for <b>Zone 4 Hornsea Round 3 Wind farm</b> cables which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£12billion in capital investment  2.8million households powered by renewable energy  £1.6billion a year in revenue from electricity generation  5.7million tonnes of CO2 reduction  130,000 tonnes of SO2 reduction  40,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Potential limitations to activities required by <b>RWE Npower for Round 2 Triton Knoll Wind farm</b> site if MCZ boundary lays over windfarm boundary. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate ):</p> <p>£3.6billion in capital investment  830,000 households powered by renewable energy  £470million a year in revenue from electricity generation  1.7million tonnes of CO2 reduction  40,000 tonnes of SO2 reduction  12,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b></p>
NG2.8 (Linc Hub)	x			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p>	<p>Note from the 2nd iteration report 'Cabling is not likely to be compatible with the site features'.</p> <p>Cables likely to be required through this area for Round 2 and 3 windfarm sites. Any restriction likely to have a significant impact on investment.</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b></p>

NG2.7 (Linc Hub)	x			Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.	There are existing active cables within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts. Additional cables likely to be required in MCZ for development of offshore renewable energy industry. Any restriction likely to have a significant impact on investment.	Assumption that cabling works are permitted however clarity required on additional levels of mitigation required.  <b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not 'support' this boundary until the management restrictions on industry are made clear</b>
NG2.6 (Linc Hub)	x			Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.  Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.	Overlays <b>Round 2 Windfarm Docking Shoal</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):  £1.6billion in capital investment 370,000 households powered by renewable energy £210million a year in revenue from electricity generation 770,000 tonnes of CO2 reduction 18,000 tonnes of SO2 reduction 5400 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets  Overlays <b>Round 2 Windfarm Race Bank</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):  £1.8billion in capital investment 430,000 households powered by renewable energy £240million a year in revenue from electricity generation 890,000 tonnes of CO2 reduction 21,000 tonnes of SO2 reduction 6200 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets	Assumption that cabling works are permitted however clarity required on additional levels of mitigation required  <b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry. Forewind do not support this boundary until the management restrictions on industry are made clear.</b>

<p><b>NG2.5 (Linc Hub)</b></p>	<p>x</p>		<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p>	<p>Overlays <b>Centrica Round 2 Windfarm Race Bank</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£1.8billion in capital investment  430,000 households powered by renewable energy  £240million a year in revenue from electricity generation  890,000 tonnes of CO2 reduction  21,000 tonnes of SO2 reduction  6200 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£945million in capital investment  220,000 households powered by renewable energy  £120million a year in revenue from electricity generation  450,000 tonnes of CO2 reduction  10,000 tonnes of SO2 reduction  3,100 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Borders <b>Centrica Round 2 Windfarm Docking Shoal</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£1.6billion in capital investment  370,000 households powered by renewable energy  £210million a year in revenue from electricity generation  770,000 tonnes of CO2 reduction  18,000 tonnes of SO2 reduction  5400 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Borders <b>Warwick Energy Round 2 Dudgeon Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£1.68billion in capital investment  390,000 households powered by renewable energy  £220million a year in revenue from electricity generation  800,000 tonnes of CO2 reduction  19,000 tonnes of SO2 reduction  5,600 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the section 'What conservation objectives might be applied to the site?' the 2<sup>nd</sup> Iteration report suggest this site 'May be a reference site – although not confident/knowledgeable enough to confirm'. Forewind would like to see this comment removed as there has been no guidance to date on designating reference sites and this should particularly be the case if there isn't enough confidence and data to confirm the importance of the area.</b></p>
--------------------------------	----------	--	--	--	--

NG2.4 (Linc Hub)	x			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p>	<p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£945million in capital investment  220,000 households powered by renewable energy  £120million a year in revenue from electricity generation  450,000 tonnes of CO2 reduction  10,000 tonnes of SO2 reduction  3,100 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the 'What activities at the site might need management?' section in the 2nd Iteration report please add: Wind farms and cables</b></p> <p><b>In the 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report please add: Renewable Industry. Forewind do not support this boundary until the management restrictions on industry are made clear.</b></p>
NG2.3		X				
NG2.2	x				<p>There are existing active cables and pipelines within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts renewables.</p> <p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> cable route which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£945million in capital investment  220,000 households powered by renewable energy  £120million a year in revenue from electricity generation  450,000 tonnes of CO2 reduction  10,000 tonnes of SO2 reduction  3,100 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required</p>

NG2.1	X			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ between the MCZ and the renewable interest area to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p>	<p>Overlays the westerly section of the <b>Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm Site</b> (area closest to land) which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£21.6billion in capital investment  5million households powered by renewable energy  £2.8billion a year in revenue from electricity generation  10million tonnes of CO2 reduction  240,000 tonnes of SO2 reduction  72,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays part of <b>Eon Round 1 Site Scroby Sands</b> which may cause operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate):</p> <p>£180million in capital investment  42,000 households powered by renewable energy  £24million a year in revenue from electricity generation  86,000 tonnes of CO2 reduction  2,000 tonnes of SO2 reduction  600 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report please add: Renewable Industry. Forewind do not 'strongly support' this boundary until the management restrictions on industry are made clear.</b></p>
BAI 1_E over Zone 5 Round 3 Site (EE Hub)	X			<p>Request to prioritise other BAIs or remove from iteration. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.</p>	<p>Overlays a significant portion of the <b>Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm Site</b> (which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to (values provided by The Crown Estate ):</p> <p>£21.6billion in capital investment  5million households powered by renewable energy  £2.8billion a year in revenue from electricity generation  10million tonnes of CO2 reduction  240,000 tonnes of SO2 reduction  72,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	

<b>BAI 2_E, 2_G, 2_F over aggregate option and Galloper Round 2 Windfarm(EE Hub</b>	X			A request was agreed by stakeholders at the EE Hub meeting and recorded in the minutes to adjust the boundary of 2_G to follow the lines of the 2_F which would result in the area avoiding the Round 2 Galloper Extension Site. This has not been adhered to in the report/GIS shapefile distributed and Forewind request that 2_E be amended as agreed.	Overlays part of the <b>SSE/RWE/Npower Renewables Round 2.5 Galloper Extension Wind Farm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:  £1.3billion in capital investment 530,000 households powered by renewable energy £200million a year in revenue from electricity generation 720,000 tonnes of CO2 reduction 17,000 tonnes of SO2 reduction 5,000 tonnes of NOx reduction Many jobs losses (up to 100) and failure of UK Gov't meeting EU Climate Change targets	Concerns over validity of BSH data here as it conflicts with SSE and RWE data
---	---	--	--	---	---	---

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)  
or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG





**Feedback from the Commercial Sector for the 2<sup>nd</sup> Iteration.**

**King's Lynn Co-Operative Association**

**Attendees – Paul & Bob Garnett.**

**9<sup>th</sup> November 2010.**

- Paul is not happy with NG2.9 – a large area was cut out at the HUB meeting because of the windfarm site – this shouldn't have been taken out. Windfarms can be located in MCZs. The Easterly edge was squared up – shouldn't have the gap.
- NG2.2 & NG2.3 – it's ok saying that potting and shrimping can continue, but cockle working and mussel suction dredging must be allowed to continue. The intertidal sands are used by many fishermen. Seed mussel beds are dredged on occasions and the spat moved into The Wash. V. Important – Blakeney Overfalls, for example. Other such sites are within NG2.3 & NG2.3.
- Fish catching (sole, skate, flounder, dab, bass, sprats) takes place in NG2.2 & NG 2.3 – 3 different types of gear. Sole/skate/flounder – demersal otter trawl and beam trawl. Bass – demersal mid-water and pelagic trawl. Some netting for soles. Stake nets & drift nets for herring. Pelagic trawl for sprats and herrings. Spratting is popular – do not want to lose it.
- There is a lot of potting activity in NG2.2 & NG2.3 – will effect a lot of fishermen. They must not be displaced. Triton Knoll and Race Bank will already cause displacement.
- Bob doesn't feel that there are many damaged areas due to fishing. Aggregate work is the most damaging activity.
- The beach replenishment scheme from Skegness down to Gibraltar Point – fishing grounds have been lost to many fishermen already. Protects the properties near to the coast. Channels have been filled in by the sand, and effects navigation.
- Chemicals / nitrates from land effected fish stocks some years ago. Damages marine life before it can grow. Halibuts were in the River Witham in the 1970s but turned green and developed sores due to detergents entering the river. Bleach often effects algae.

Dan Davis

16<sup>th</sup> November 2010





**Feedback from the Commercial Sector for the 2<sup>nd</sup> Iteration.**

**North Norfolk Fishermen's Association.**

**Attendees – Billy Gaff (Vice Chairman) North Norfolk FA, Vice Chair of ESFJC/IFCA, landlord and county councillor, Fran Weatherhead (Secretary), 26 members of the North Norfolk FA**

**9<sup>th</sup> November 2010.**

- Can the Association have confirmation that potting will not be banned?
- Gas pipes – very destructive.
- It was noted that some commercial fishermen are not attending the HUBs – can 2 other commercial fishermen (John Lee & Kevin Joanas) take their place?
- Why do Cromer fishermen have to have MCZs in their area?
- Who will be policing the MCZs?
- It was felt MCZs should be in straight lines for policing.
- How will the remaining HUB meetings work? What work will be done at them?
- It is important that Commercial interests are heard.
- Cromer fishermen treat their fishing grounds like a farm – they feed it, nurture it, etc.

Dan Davis

16<sup>th</sup> November 2010



**Feedback from the Commercial Sector for the 2<sup>nd</sup> Iteration.**

**Lynn Shellfish**

**Attendees – Steve Williamson, Gary Taylor, Jan Arden, David Mott, Robert Roper, P Craig, Dean English, John Plumley.**

**12<sup>th</sup> November 2010.**

- NG2.7 and NG2.1 – important fish beaming areas. Need to ensure as to whether it is compatible with the habitat. Important sole ground.
- NG2.3 – EE HUB have put in this MCZ. Cockle dredging has been listed as not compatible but it MUST be allowed in this area. Mussel dredging must also be allowed.
- EE HUB have put NG2.3 out of their own area.
- What does the BAI near the Silver Pits cover? DD to investigate.
- DD explained that the 2<sup>nd</sup> iteration feedback will go into the next StAP meeting for comment.

Dan Davis

16<sup>th</sup> November 2010



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

Name **Paul Reynolds** .....

Sector represented **RenewableUK (wind, wave and tidal energy generation)**.....

Regional Hub RenewableUK sit on the StAP and our members sit on all hubs

### RenewableUK general comment:

RenewableUK fully supports the process of designating a network of MPAs and our members are committed to engaging constructively with the designation process. This can be seen through our engagement on the Net Gain StAP, National MPA Forum and regular meetings with the SNCBs. We also co-ordinate the renewables industry response to MCZs with all Net Gain hub members sitting on an MCZ working group at RenewableUK. Having said this, RenewableUK has a number of concerns with both the process and this 2<sup>nd</sup> iteration as drawn up by Net Gain,

The primary concern is the lack of knowledge on the implications of designation of MCZs on renewables activities and the uncertainty, potential for delay and increased cost this creates for developers who are looking to develop multi-billion pound projects. The renewables industry acknowledges the potential for co-location of renewables and MCZs but cannot currently endorse this approach until further guidance is provided on the conservation objectives and management measures of designation. We also note that, although the SAP and others have proposed co-location, the Sensitivity Matrix indicates that most of the Broad Scale Habitats (BSH) and Features of Conservation Importance (FOCI) identified in each dMCZ for protection are sensitive to the activities undertaken by the renewables industry. This would again suggest a level of restriction on activities or management measures for the MCZ. This uncertainty on the implications of a MCZ designation also comes at a critical time for the industry as many projects are in the consenting phase and are likely to be affected by early MCZ designation without properly taking into account the economic and consent risk ramifications. Offshore wind is also looking to expand rapidly and is competing for global investment which may choose to locate elsewhere if the uncertainty is too great. Offshore wind is also critical to meeting our legally binding EU 2020 renewable energy targets and for mitigating the impacts of climate change. RenewableUK produced a position paper on co-location which details this point in more detail and is available on request.

RenewableUK would also request that greater renewables representation is allowed on the regional hubs where developers may be impacted by developments.

### Netgain MCZ Process

RenewableUK have serious concerns with how the compatibility matrix is being used by stakeholders with too little information or guidance being provided leading to incorrect or misleading results. There has also not been enough discussion at the hubs as to the limitations of the sensitivity matrix as clearly defined in the ABPmer report (p7). RenewableUK would suggest that further guidance is produced on the use of the matrix and that at the start of any future hub meetings there is a presentation detailing how to use the matrix and most importantly, the limitations of such a tool as detailed in the ABPmer report. RenewableUK would also suggest that more could be done to allow stakeholders to understand the implications of designation on other stakeholders which they quite understandably may not understand, for instance, the Irish Sea Conservation Zone had an introductory session where stakeholders wrote down and shared their concerns and issues with the group as a whole. This then led to a more productive meeting and something similar could be considered at Net Gain.

Further, many stakeholders appear to be working on the assumption that cabling would be allowed through MCZs but this does not appear to be borne out in the Sensitivity Matrix which indicates medium or high sensitivity for cabling through most BSH and FOCI. RenewableUK would suggest that the installation of cable is a relatively benign activity for most habitats but would request additional clarity on the mitigation measures that might be required through different habitats as previous experience suggests that cable mitigation measures can be expensive. More information can be provided on request.

We also have concerns over the quality of the data with the EUNIS Level 3 Broad Scale Habitat data being highly inaccurate and ultimately leading to a low confidence in the justification for the boundary locations and subsequent conservation objectives and management measures. Given the strategic importance of renewables and the scale of the planned investment over the next decade we are concerned that the data underpinning such designations is so poor. We note that designations have to be made on the basis of best available data but suggest that designations are not confirmed until there is a much greater confidence and validity in the data.

RenewableUK also have concerns on how designations in those areas which overlap other hubs are taken forward. It seems that much of the discussions and recommendations from one hub is lost or not communicated well enough when moving from one hub to another. This overlap also leads to stakeholders seeking to push sites into these areas of overlap and away from their own personal interests. More should be done to ensure that overlapping hubs are aware of what the other hub is doing and why. Similarly when detailing the outcomes in the 2<sup>nd</sup> progress report it should be made clear which hub supported which designation and whether the other overlapping hub also supported it and why.

RenewableUK was disappointed by the changes to the SAP/SPA gap analysis during the hub process and requests that clarity on this issue is provided as soon as possible to facilitate the whole process. We would also request clarity on the Dogger Bank pSAC and whether this will be included in the MCZ network as this has key implications for the Forewind development and also the rest of the Net Gain project given the scale of the habitats contained in the pSAC.

RenewableUK would also like to raise our concerns with the index of stakeholder support which seems to support those sectors with multiple representations as opposed to those individuals who represent a sector. The renewable industry has been allocated one place at many of the hubs which makes it difficult to get across the level of support or disagreement using such an index. Further, renewables representatives are put in a difficult position as the stakeholders round the table are also the key stakeholders for their own projects, thus limiting the extent to which reps are comfortable in pushing a point in such a forum. RenewableUK would request that there is the opportunity for renewables reps to speak to Net Gain staff outside of the meeting to ensure that our views are captured properly.

## 2<sup>nd</sup> Iteration Report and Hub Reports

RenewableUK would request that Table 5 of the 2<sup>nd</sup> Iteration Report is updated to include the information included in this response as there are a number of omissions with Table 5.

A request was agreed by stakeholders at the EE Hub meeting and recorded in the minutes to adjust the boundary of 2\_G to follow the lines of the 2\_F which would result in the area avoiding the Round 2 Galloper Extension Site. This has not been adhered to in the report/GIS shapefile distributed and RenewableUK request that 2\_E be amended as agreed.

In order to respond to this consultation we have discussed with the relevant developers and the Crown Estate.

Please note: RenewableUK does not want to take such a negative approach to these potential sites but feel that there is little option given the vast uncertainty of designation on projects and this should not come as a surprise to Net Gain. Clarity on this key issue would move the debate forward. We have also made some suggestions including implementing a buffer zone of 500-1000m and clarification on the mitigations of cabling that should allow us to be much more positive about many sites. We hope that these concerns can be addressed and the result is an easier process for all concerned. As ever, we offer the use of our network of working groups and members to Net Gain if there is anything we can do to help them in this difficult process.

NB – Figures are sourced from the Crown Estate Impact Assessment, available on request.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			

<b>NG2.22</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Borders Forewind's Dogger Bank Round 3 Wind Farm which will cause consenting, installation and operation constraints. This could lead to a loss of approximately £27billion in capital investment and 13million tonnes of CO2 reduction. For more details see the Crown Estate Impact Assessment for details of potential cost.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.
<b>NG2.21</b>			X			
<b>NG2.20</b>			X			
<b>NG2.19</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Overlays E.ON's Blythe offshore wind farm which could cause operational constraints to the project. See the Crown Estate impact assessment for details.  Also overlays Blyth NAREC Demonstration Wind Farm which has major implications for development of Round 3. This site is where technology will be tested and is critical for developing a UK offshore wind manufacturing industry that could deliver 57,000 jobs by 2020 (Bain&Co).  Cabling likely to be required and the unknown management implications are a concern to industry.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"
<b>BAI (2F) Reserve Choice (North Hub)</b>	x			We would request that other BAIs are prioritised, if the BAI is needed at all, as they are likely to have a lower economic impact.	Borders Forewind's Dogger Bank Round 3 Wind Farm which will cause consenting, installation and operation constraints. This could lead to a loss of approximately £27billion in capital investment and 13million tonnes of CO2 reduction. For more details see the Crown Estate Impact Assessment for details of potential cost.	



<b>NG2.18 (North)</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Borders Forewind's Dogger Bank Round 3 Wind Farm which will cause consenting, installation and operation constraints. This could lead to a loss of approximately £27billion in capital investment and 13million tonnes of CO2 reduction. For more details see the Crown Estate Impact Assessment for details of potential cost.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.
<b>NG2.17 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request that the MCZ avoids Forewind Project 1 cable corridor search area and for a 500m-1km buffer to be applied to the boundary of the MCZ to avoid impact on renewable industry.  Doing so should allow RenewableUK to change our opinion to positive.	Borders Forewind's Dogger Bank Round 3 Wind Farm which will cause consenting, installation and operation constraints. This could lead to a loss of approximately £27billion in capital investment and 13million tonnes of CO2 reduction. For more details see the Crown Estate Impact Assessment for details of potential cost.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"
<b>NG2.16 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request that the MCZ avoids Forewind Project 1 cable corridor search area and for a 500m-1km buffer to be applied to the boundary of the MCZ to avoid impact on renewable industry.  Doing so should allow RenewableUK to change our opinion to positive for this site.	Overlays Forewind's Dogger Bank Round 3 Wind Farm which will cause consenting, installation and operation constraints. This could lead to a loss of approximately £27billion in capital investment and 13million tonnes of CO2 reduction. For more details see the Crown Estate Impact Assessment for details of potential cost.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required. Until then RenewableUK cannot support such a designation.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"

<b>NG2.15 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request for clarity on the level of restriction of cabling activity that will be needed for that MCZ	Potential site for cables from Dogger Bank wind farm. See above for costs	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.
<b>NG2.14 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request for clarity on the level of restriction of cabling activity that will be needed for that MCZ	Potential site for cables from Dogger Bank wind farm.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.
<b>NG2.13 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farms and cable routes to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Borders Hornsea wind farm and could cause consenting, operating and construction impacts. See Crown Estate Impact Assessment	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"
<b>NG2.12 (Yorkshire and Humber Hub)</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Is likely to overlay the cable route for Humber Gateway, Westernmost Rough, Hornsea and Dogger Bank cable routes. For more details on potential cost. see the Crown Estate Impact Assessment.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"

<b>BAI Large area specifically: 2B,2D,2C, 1H, 1B and 1G Reserve Choice (Yorkshire and Humber Hub)</b>	x			<p>We would request that other BAIs are prioritised, if the BAI is needed at all, as they are likely to have a lower economic impact while meeting the ENG.</p>	<p>Overlays Zone 4 Hornsea Round 3 Wind farm, Centrica Round 2 Race Bank Windfarm, Warwick Energy Round 2 Dudgeon Windfarm and Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm which will cause consenting, installation and operation constraints. See Crown Estate impact assessment for potential losses</p>	<p>Current support level indicated as mixture of 'supported' and 'against' by stakeholders in 2<sup>nd</sup> iteration. RenewableUK suggest this is amended to Against.</p>
<b>NG2.11 (Linc Hub)</b>	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Overlays Hornsea wind farm zone – see above for costs</p>	<p>RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.</p> <p>Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"</p>

NG2.10	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Overlays Hornsea and Dogger Bank wind farm cable routes – see above for costs</p>	<p>RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.</p> <p>Please note our objections to this site in section detailing level of consensus. Suggested text: “RenewableUK cannot support this MCZ until further details on management measures are known”</p>
NG2.9	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative.</p> <p>We would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ given that the report says ‘Cabling is not likely to be compatible with the site features’.</p> <p>.</p>	<p>Overlays Hornsea Triton Knoll wind farm and the Hornsea wind farm cable route which may cause difficulties in consenting, construction and operation. See Crown Estate impact assessment for details.</p> <p>We also note that the 2nd iteration report states that ‘Cabling is not likely to be compatible with the site features’.</p>	<p>RenewableUK requests clarity on the additional levels of mitigation required.</p> <p>Please note our objections to this site in section detailing level of consensus. Suggested text: “RenewableUK cannot support this MCZ until further details on management measures are known”</p>

NG2.8	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Note from the 2nd iteration report 'Cabling is not likely to be compatible with the site features'.</p> <p>Cables likely to be required through this area for Hornsea wind farm and Triton Knoll wind farm. Any restriction likely to have a significant impact on investment. See Crown Estate</p>	<p>Clarity is required on the additional levels of mitigation for cabling required.</p>
NG2.7	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Cables likely to be required through this area for Hornsea wind farm and Triton Knoll wind farm. Any restriction likely to have a significant impact on investment. See Crown Estate Impact Assessment</p>	<p>RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.</p>

NG2.6	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Overlays Race Bank and Docking Shoals wind farms. We note that although Race Bank is a dSAC, we cannot support it's designation as an MCZ because of the uncertainties surrounding an MCZ designation in comparison to an SAC designation.</p> <p>Restrictions could lead to substantial decrease in investment and corresponding losses (see Crown Estate Impact Assessment for details)</p>	<p>RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.</p> <p>Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"</p>
NG2.5	x			<p>RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ</p>	<p>Overlays Race Bank, Docking Shoal, Sheringham Shoal and borders Dudgeon wind farms. Restriction could lead to substantial reduction in investment (see Crown Estate Impact Assessment)</p>	<p>RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.</p> <p>The 2<sup>nd</sup> iteration report states that this may be suitable as a reference site and given our current understanding of reference sites, RenewableUK would strongly object to this site being designated as a reference site.</p> <p>Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"</p>

<b>NG2.4</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Overlays Sheringham Shoal wind farm and restriction may significantly reduce investment (see Crown Estate impact assessment)	There is an assumption that cabling works are permitted however clarity is required on the additional levels of mitigation required.  In the 'What activities at the site might need management?' section in the 2nd Iteration report please add: Wind farms and cables  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"
<b>NG2.3</b>	x			RenewableUK request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Overlays cable routes for existing and potential cable routes for a number of Round 2 wind farm sites such as Lynn and Inner Dowsing, Lincs, Race Bank and Docking Shoal.  Restrictions to consenting/construction/operation could lead to significant losses.	In the 'What activities at the site might need management?' section in the 2nd Iteration report please add: Wind farms and cables
<b>NG2.2</b>			X			
<b>NG2.1</b>	X			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Overlays the East Anglia Zone 3. wind farm and the Scroby Sands wind farm. Restrictions on activities could lead to a significant loss of investment/revenue. See Crown Estate Impact Assessment for details.	RenewableUK assume that cabling works are permitted however clarity is required on the additional levels of mitigation required.  Please note our objections to this site in section detailing level of consensus. Suggested text: "RenewableUK cannot support this MCZ until further details on management measures are known"

<b>BAI 1_E over Zone 5 Round 3 Site (EE Hub)</b>	X			We would strongly request that other BAIs are prioritised, if the BAI is needed at all, as there are other habitat sites in the East of England hub which are likely to have a lower economic impact than this one.	Overlays a significant portion of the Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm site. Restriction could lead to a loss of £21.6 billion in capital investment and 10million tonnes of CO2 reduction.	RenewableUK supports the letter to the StAP from Vattenfall and Scottish Power on this issue.
<b>BAI 1_B (EE Hub)</b>	x			RenewableUK would request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry. Doing so would reduce many of the issues with this site and is likely to result in a change in our support for this site away from negative, although we would also request for clarity on level of restriction of cabling activity that will be needed for that MCZ	Overlays a portion of the Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm site and cable route. Restriction could lead to a loss of £21.6 billion in capital investment and 10million tonnes of CO2 reduction.	



<b>BAI 2_E, 2_G, 2_F over Gallope r Round 2 Windfar m(EE Hub</b>	x			<p>RenewableUK would be STRONGLY in favour of this BAI provided that the BAI is clipped so as to avoid the Galloper wind farm extension. This action was agreed by stakeholders at the EE Hub meeting and recorded in the minutes (to adjust the boundary of 2_G to follow the lines of the 2_F which would result in the area avoiding the Round 2 Galloper Extension Site) but has not been carried through in the notes. We would also request for a 500-1000m buffer zone to be applied between a MCZ and boundary of wind farm to avoid impact on renewables industry and if the BAI is changed in this way it would be strongly supported by RenewableUK.</p>	<p>Overlays part of the Galloper Extension Wind farm which may cause consenting, installation and operation constraints. For details of potential losses see the Crown Estate Impact assessment</p>	<p>Provided the BAI is clipped to avoid the wind farm then RenewableUK would strongly support this BAI.</p>
--	---	--	--	---	---	---

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

Name **Andrew Finlay** .....

Sector represented **The Crown Estate** .....

Regional Hub **All Hubs** .....

### **The Crown Estate general comment:**

The Crown Estate is wholly supportive of the overall aims of the MCZ process and the establishment of an ecological coherent network of Marine Protected Areas. This support is being conveyed through the application of Crown Estate resources to all four MCZ projects to ensure thorough and active engagement and assistance to the project teams throughout the process. However The Crown Estate has some key concerns which we would like Government and the Project Teams to address:

The Crown Estate would like to be positive and endorse all MCZs however the Sensitivity Matrix indicates that most of the Broad Scale Habitats (BSH) and Features of Conservation Importance (FOCI) identified in each dMCZ for protection are sensitive to the activities leased by The Crown Estate, i.e. aggregates, cables, renewables etc. This implies a level of restriction and management which remains uncertain and a major concern to industry. This is confounded by a lack of guidance and clarity on the future restriction of activities and management of MCZs.

The Crown Estate recognises the potential for renewable (wind, wave and tidal) industries to co-locate with MCZs however, until further guidance is provided on the potential management implications for developers (planned and unplanned), we regrettably cannot endorse an MCZ network based on co-location. The implications remain highly uncertain and present a considerable risk to investment in renewable projects and the potential for escalating costs involved in consenting and additional mitigation requirements. The Crown Estate has the same concerns regarding other assets such as aggregates.

### **Netgain MCZ Process**

Stakeholders and Netgain should not assume that cabling is compatible with MCZs as the Sensitivity Matrix indicates medium or high sensitivity for most BSH and FOCI and offshore wind farm consenting experience highlights that the presence of national environmental designations are likely to require additional or specific and potentially more expensive mitigation requirements for developers. Clarity needs to be provided on the level of mitigation that would be required for each BSH and FOCI before stakeholders and the project team make any assumptions informing decisions on locations of MCZs and subsequent management measures.

It has been assumed by stakeholders that cabling would not be allowed through reference sites. At what stage will reference sites be identified? How will this be done and will there be an opportunity for stakeholder input prior to formal consultation on these?

For stakeholders making key decisions on the locations and justification for MCZs in Hub Meetings, no training on the use of the sensitivity matrices has been given and there are examples of misuse and misinterpretation leading to inappropriate MCZ locations being proposed. Will project teams/Natural England/JNCC be providing advice to stakeholders on the use of the matrices, including the assumptions and limitations so that issues such as temporal and spatial scale of activities are taken into account when proposing management measures?

The EUNIS Level 3 Broad Scale Habitat data being used to identify the nominal square km ENG targets and define boundaries is highly inaccurate which leads to low confidence in the justification for the boundary locations and subsequent conservation objectives and management measures. The Crown Estate recognise the limitations of the 'best available data' however is highly concerned about the future implications of management of sites (and restriction of activities) that may potentially be designated for the wrong features.

Most of the FOCI identified for protection in different MCZs are widely distributed across Netgain but are only identified on maps due to presence of survey data by industry in those specific areas. It is wholly inappropriate to prioritise BAIs and dMCZs on FOCI datasets that are misrepresentative of the geographic distribution of these species and habitats. Considering the inadequacies of the data, the process should not justify prioritisation of MCZs based on FOCI data. How much importance and protection will be afforded to the FOCI within each MCZ?

The overlap between regional hub boundaries makes for undemocratic resolution of boundaries by the StAP as some areas are being double-counted/proposed due to hub overlap. As a result, discussions at one hub which lead to an area being specifically avoided are effectively lost in the process when another hub suggests an MCZ in the same area without being party to discussions in other hubs. The Crown Estate request that major caveats be applied to sites which have been double counted indicating double support where there has been overlap of Hub Meeting boundaries. The Crown Estate suggests that the outputs of each HUB be presented before each meeting to show where there is overlap and for Netgain to explain why areas have been chosen or avoided.

The application of an index of stakeholder support for each BAI and dMCZ is misleading as this process favours sectors with multiple representation or those without wide reaching interests who are therefore content on passing poor technical judgement on areas that do not impact on their interests. It doesn't adequately take into account sectoral interests represented by a single individual. This is evident by the limited range of "support" to "strong support" for proposed areas. The Crown Estate request that stakeholders with limited understanding of different sectors be briefed on the economic importance of different industries to the UK economy at the next round of Hub meeting to understand the economic implications of decisions. The Crown Estate also request that wind farm developers be invited to the Hub meetings if their project is located within the regional boundaries.

Clarity is required on the final GAP analysis so that the StAP and Hub members are informed to what degree the BSH percentage targets have been met and how much still remains to be identified. In particular stakeholders need to know if the Dogger Bank pSAC will be included as an MCZ and if the potential inclusion reduces BSH targets in the North Hub only or for the Netgain area as a whole. The Crown Estate suggests it is not sensible to assess BSH target requirements for each HUB in isolation as it leads to an unnecessary amount of BAIs remaining for consideration and a high degree of anxiety for some industries.

## 2<sup>nd</sup> Iteration Report and Hub Reports

Please check Table 5 of the 2<sup>nd</sup> Iteration Report versus the activities listed below as there are many omissions of activities in dMCZs. Please cross reference the narrative for all MCZs with the tables provided below as there are many omissions of activity and levels of support information.

A request was agreed by stakeholders at the EE Hub meeting and recorded in the minutes to adjust the boundary of 2\_G to follow the lines of the 2\_F which would result in the area avoiding the Round 2.5 Galloper Extension Site. This has not been adhered to in the report/GIS shapefile distributed and The Crown Estate request that 2\_E be amended as agreed.

The following feedback has been provided through a review of the MaRS database of all activities leased by The Crown Estate on the seabed and from internal consultation in The Crown Estate (Wind, Wave and Tidal, Aggregates, Coastal) and external consultation with Aggregates Industry and Renewable Industry (RUK and Offshore Wind farm developers).

Please note: Most of The Crown Estate's opinions of potential sites are negative however this is likely to change to positive if the suggested adjustments and requests for information were provided.

### This feedback has been discussed with RUK, BMAPA, Offshore Windfarm developers

For next iteration, Government guidance on the implications of co-location for industry (renewable and aggregates) and on use of matrices to inform management measures would be highly beneficial and assist The Crown Estate in understanding the implications of MCZs and enable the level of support to be amended.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
					<p>Please note the figures provided here for wind farms are estimates and based on the maximum capacity planned for each wind farm and would be subject to change based on future developments and the views may vary between developers. The value of aggregates has been calculated by totalling the combined resource volume of the different existing licenses, applications and resources and multiplying the volume by £20 (assuming the ex-gate value of £20 per m3 or about £13 per tonne) and dividing the value by the area of resource to generate a total value per km2. Note that the value for each area is an average and this may vary locally by &gt;50% across a zone.</p>	

NG2.22	x			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£27billion in capital investment          6.2million households powered by renewable energy          £3.5billion a year in revenue from electricity generation          13million tonnes of CO2 reduction          300,000 tonnes of SO2 reduction          90,000 tonnes of NOx reduction          Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry and the Crown Estate. These stakeholders do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
NG2.21			X			
NG2.20			X			

NG2.19	x			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request that current disposal sites not be restricted, displaced or require additional mitigation.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>The following activities may impact on the site and may be restricted:</p> <p>Two licensed disposal Sites (Coquet Island and Blyth A and B), Currently Closed Disposal Site (Amble), Close proximity to two closed disposal sites (Tyne and Howdon Area). These sites are important to maintain access to ports/harbours.</p> <p>Overlays the E.ON Climate &amp; Renewables Blyth Wind Farm which may cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <p>£12million in capital investment 2,800 homes powered by renewable energy £1.6million a year in revenue from electricity generation 5,700 tonnes of CO2 reduction 130 tonnes of SO2 reduction 40 tonnes of NOx reduction Jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays Blyth NAREC Demonstration Wind Farm which has major implications for development of Round 3. This site is where technology will be tested.</p> <p>Cabling likely to be required and the unknown management implications are a concern to industry.</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry and the Crown Estate. These stakeholders do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
BAI (2F) Reserve Choice (North Hub)	x			<p>Request to prioritise other BAIs. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.</p> <p>The BAI to the south of NG2.18 meets the ENG target and would be a preferable BAI to put forward.</p>	<p>Overlays part of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£27billion in capital investment 6.2million households powered by renewable energy £3.5billion a year in revenue from electricity generation 13million tonnes of CO2 reduction 300,000 tonnes of SO2 reduction 90,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>If new data provided by fisheries interviews identifies MCZ 4D as highly fished there is potential to designate this alternative reserve area. This is a concern and TCE request that alternative BAIs be prioritised.</p>

<p><b>NG2.18 (North)</b></p>	<p>X</p>			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <p>£27billion in capital investment          6.2million households powered by renewable energy          £3.5billion a year in revenue from electricity generation          13million tonnes of CO2 reduction          300,000 tonnes of SO2 reduction          90,000 tonnes of NOx reduction          Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry and the Crown Estate. These stakeholders do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
<p><b>NG2.17 (Yorkshire and Humber Hub)</b></p>	<p>X</p>			<p>Request to avoid Forewind Project 1 cable corridor search area (recently supplied to Netgain) and for a 500m-1km buffer to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request to avoid high value aggregate area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Abuts with the border of <b>Forewind Dogger Bank Round 3 Wind Farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£27billion in capital investment          6.2million households powered by renewable energy          £3.5billion a year in revenue from electricity generation          13million tonnes of CO2 reduction          300,000 tonnes of SO2 reduction          90,000 tonnes of NOx reduction          Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays an existing aggregate extraction site and high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £6.4million per km2.</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry, Aggregate Industry and the Crown Estate. These stakeholders do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>

NG2.16 (Yorkshire and Humber Hub)	x			<p>Request to avoid Forewind Project 1 cable corridor search area (recently supplied to Netgain) and for a 500m-1km buffer to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays <b>Forewind Dogger Bank Round 3 Wind Farm cable corridor</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <p>£27billion in capital investment          6.2million households powered by renewable energy          £3.5billion a year in revenue from electricity generation          13million tonnes of CO2 reduction          300,000 tonnes of SO2 reduction          90,000 tonnes of NOx reduction          Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry and the Crown Estate. These stakeholders do not 'support' this boundary until the management restrictions on industry are made clear.</b></p>
NG2.15 (Yorkshire and Humber Hub)	x			<p>Request for an assumption in the MCZ narrative to state Potash mining activities would not require restriction</p>	<p>Unclear if Potash would require additional management measures</p> <p>Waste Disposal Site – Cleveland Potash may be restricted</p> <p>Cables/Pipelines</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p>
NG2.14 (Yorkshire and Humber Hub)	x			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs being protected</p>	<p>Potential restriction to existing active Cables x 4 connect UK to Denmark, Norway and Germany. These require maintenance as essential telecommunications with Europe</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p>



<p><b>NG2.13 (Yorkshire and Humber Hub)</b></p>	<p>X</p>			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Rough Gas Storage Lease - Potential restriction to future carbon capture and natural gas storage– Activity not listed in Sensitivity Matrix so implication uncertain.</p> <p>Potential restriction to existing active cables and pipelines. These require maintenance as essential telecommunications with Europe</p> <p>Abuts with the border of <b>Zone 4 Hornsea Round 3 Wind farm</b> likely to require cables in this area. An MCZ bordering the windfarm in this area will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <p>£12billion in capital investment  2.8million households powered by renewable energy  £1.6billion a year in revenue from electricity generation  5.7million tonnes of CO2 reduction  130,000 tonnes of SO2 reduction  40,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays an existing aggregate extraction site and high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £8.675million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry, Aggregate Industry and the Crown Estate. These key stakeholder do not 'support' this boundary until the management restrictions on industry are made clear</b></p>
---	----------	--	--	--	---	---

<p><b>NG2.12 (Yorkshire and Humber Hub)</b></p>	<p>X</p>			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on Round 2 sites Humber Gateway and Westmost Rough.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays <b>Zone 3 Forewind Dogger Bank Round 3 Wind Farm cable corridor</b> which <b>require connection to the grid along this coast</b> and will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£27billion in capital investment          6.2million households powered by renewable energy          £3.5billion a year in revenue from electricity generation          13million tonnes of CO2 reduction          300,000 tonnes of SO2 reduction          90,000 tonnes of NOx reduction          Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry and the Crown Estate. These key stakeholder do not 'support' this boundary until the management restrictions on industry are made clear</b></p>
---	----------	--	--	---	---	---

<p><b>BAI Large area specific ally: 2B,2D,2C, 1H, 1B and 1G Reserve Choice (Yorkshire and Humber Hub)</b></p>	<p>X</p>			<p>Request to prioritise other BAIs. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.</p>	<p>Overlays <b>Zone 4 Hornsea Round 3 Wind farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <ul style="list-style-type: none"> <li>£12billion in capital investment</li> <li>2.8million households powered by renewable energy</li> <li>£1.6billion a year in revenue from electricity generation</li> <li>5.7million tonnes of CO2 reduction</li> <li>130,000 tonnes of SO2 reduction</li> <li>40,000 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Centrica Round 2 Race Bank Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <ul style="list-style-type: none"> <li>£1.86billion in capital investment</li> <li>430,000 households powered by renewable energy</li> <li>£240million a year in revenue from electricity generation</li> <li>890,000 tonnes of CO2 reduction</li> <li>21,000 tonnes of SO2 reduction</li> <li>6,200 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Warwick Energy Round 2 Dudgeon Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of upto:</p> <ul style="list-style-type: none"> <li>£1.68billion in capital investment</li> <li>390,000 households powered by renewable energy</li> <li>£220million a year in revenue from electricity generation</li> <li>800,000 tonnes of CO2 reduction</li> <li>19,000 tonnes of SO2 reduction</li> <li>5,600 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£945million in capital investment</li> <li>220,000 households powered by renewable energy</li> <li>£120million a year in revenue from electricity generation</li> <li>450,000 tonnes of CO2 reduction</li> <li>10,000 tonnes of SO2 reduction</li> <li>3,100 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlay several aggregate production licenses and option areas and high value resource areas valued at between £2-8.6million per km2. Potential sterilisation of this economic resource if restrictions are applied.</p>	<p>Current support level indicated as mixture of 'supported' and 'against' by stakeholders in 2<sup>nd</sup> iteration. The Crown Estate suggest this is amended to Against.</p>
---	----------	--	--	---	--	--

<p><b>NG2.11</b> <b>(Linc Hub)</b></p>	<p>x</p>			<p>Request to avoid Zone 4 Round 3 Windfarm Site and for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes would remove all expected impacts stated opposite and change opinion to positive.</p>	<p>Overlays <b>Zone 4 Hornsea Round 3 Wind farm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£12billion in capital investment 2.8million households powered by renewable energy £1.6billion a year in revenue from electricity generation 5.7million tonnes of CO2 reduction 130,000 tonnes of SO2 reduction 40,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays an existing aggregate extraction site and high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to£2.050million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Aggregate Industry, Renewable Industry and the Crown Estate. These key stakeholder do not 'support' this boundary until the management restrictions on industry are made clear</b></p>
<p><b>NG2.10</b> <b>(Linc Hub)</b></p>	<p>x</p>			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid aggregate prospecting area and high value area and consider a buffer zone to reduce potential impacts from plumes</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlay area potentially required for <b>Zone 4 Hornsea Round 3 Wind farm</b> cables which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£12billion in capital investment 2.8million households powered by renewable energy £1.6billion a year in revenue from electricity generation 5.7million tonnes of CO2 reduction 130,000 tonnes of SO2 reduction 40,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays an existing aggregate extraction site (Humber Estuary Aggregate Extraction Option License Area) and high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £8.675million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Aggregate Industry, Renewable Industry and the Crown Estate. These key stakeholder do not 'support' this boundary until the management restrictions on industry are made clear</b></p>

<p><b>NG2.9 (Linc Hub)</b></p>	<p>x</p>			<p>Request for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Note from the 2n iteration report ‘Cabling is not likely to be compatible with the site features’.</p> <p>Overlay area potentially required for <b>Zone 4 Hornsea Round 3 Wind farm</b> cables which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£12billion in capital investment  2.8million households powered by renewable energy  £1.6billion a year in revenue from electricity generation  5.7million tonnes of CO2 reduction  130,000 tonnes of SO2 reduction  40,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov’t meeting EU Climate Change targets</p> <p>Potential limitations to activities required by <b>RWE Npower for Round 2 Triton Knoll Wind farm</b> site if MCZ boundary lays over windfarm boundary. Depending on level of restriction, potentially a loss of up to:</p> <p>£3.6billion in capital investment  830,000 households powered by renewable energy  £470million a year in revenue from electricity generation  1.7million tonnes of CO2 reduction  40,000 tonnes of SO2 reduction  12,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov’t meeting EU Climate Change targets</p> <p>Borders the Humber Estuary aggregate extraction site with a production licence and overlays a high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £8.675million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a ‘Are there blocks to reaching consensus?’ section in the 2<sup>nd</sup> Iteration report: Aggregate Industry, Renewable Industry and the Crown Estate. These key stakeholder do not ‘support’ this boundary until the management restrictions on industry are made clear</b></p>
--	----------	--	--	---	--	---

<p><b>NG2.8 (Linc Hub)</b></p>	<p>x</p>			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Note from the 2n iteration report ‘Cabling is not likely to be compatible with the site features’.</p> <p>Cables likely to be required through this area for Round 2 and 3 windfarm sites. Any restriction likely to have a significant impact on investment.</p> <p>Borders the Humber Estuary, Off Saltfleet, North Dowsing, Humber Overfalls aggregate extraction sites with production/option/application licences and overlays a high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £8.675million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the ‘What activities at the site might need management?’ section in the 2<sup>nd</sup> Iteration states the response states ‘None - aggregate dredging areas already avoided’.</b></p> <p><b>There will be management implications for sites that border aggregate sites due to plumes and smothering.</b></p> <p><b>Please add a ‘Are there blocks to reaching consensus?’ section in the 2<sup>nd</sup> Iteration report: Aggregate Industry and the Crown Estate. These stakeholders do not support this boundary until the management restrictions on industry are made clear.</b></p>
<p><b>NG2.7 (Linc Hub)</b></p>	<p>x</p>			<p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>There are existing active cables and pipelines within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts for communications and oil and gas.</p> <p>Additional cables likely to be required in MCZ for development of offshore renewable energy industry. Any restriction likely to have a significant impact on investment.</p> <p>Overlays a high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £8.675million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required.</p> <p><b>Please add a ‘Are there blocks to reaching consensus?’ section in the 2<sup>nd</sup> Iteration report: Aggregate Industry and the Crown Estate. These stakeholders do not support this boundary until the management restrictions on industry are made clear.</b></p>

<p><b>NG2.6 (Linc Hub)</b></p>	<p>x</p>			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays <b>Round 2 Windfarm Docking Shoal</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£1.6billion in capital investment  370,000 households powered by renewable energy  £210million a year in revenue from electricity generation  770,000 tonnes of CO2 reduction  18,000 tonnes of SO2 reduction  5400 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays <b>Round 2 Windfarm Race Bank</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£1.8billion in capital investment  430,000 households powered by renewable energy  £240million a year in revenue from electricity generation  890,000 tonnes of CO2 reduction  21,000 tonnes of SO2 reduction  6200 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlaps existing Production License (Inner Dowsing) and High Value resource area. Potential to sterilise resource valued at £8.675million per km2</p> <p>Cables likely to be deployed and operated in area and restrictions/additional mitigation requirements/cost implications unknown.</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p> <p><b>Please add a 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report: Renewable Industry, Aggregate Industry and the Crown Estate. These stakeholders do not support this boundary until the management restrictions on industry are made clear.</b></p>
--------------------------------	----------	--	--	--	---	--

<p><b>NG2.5 (Linc Hub)</b></p>	<p>X</p>			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays <b>Centrica Round 2 Windfarm Race Bank</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£1.8billion in capital investment</li> <li>430,000 households powered by renewable energy</li> <li>£240million a year in revenue from electricity generation</li> <li>890,000 tonnes of CO2 reduction</li> <li>21,000 tonnes of SO2 reduction</li> <li>6200 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£945million in capital investment</li> <li>220,000 households powered by renewable energy</li> <li>£120million a year in revenue from electricity generation</li> <li>450,000 tonnes of CO2 reduction</li> <li>10,000 tonnes of SO2 reduction</li> <li>3,100 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Borders <b>Centrica Round 2 Windfarm Docking Shoal</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£1.6billion in capital investment</li> <li>370,000 households powered by renewable energy</li> <li>£210million a year in revenue from electricity generation</li> <li>770,000 tonnes of CO2 reduction</li> <li>18,000 tonnes of SO2 reduction</li> <li>5400 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Borders <b>Warwick Energy Round 2 Dudgeon Windfarm</b> which will cause consenting, installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£1.68billion in capital investment</li> <li>390,000 households powered by renewable energy</li> <li>£220million a year in revenue from electricity generation</li> <li>800,000 tonnes of CO2 reduction</li> <li>19,000 tonnes of SO2 reduction</li> <li>5,600 tonnes of NOx reduction</li> <li>Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Borders Outer Dowsing Aggregate site with an active production license and overlays high value aggregate resource area valued at £6.4million per km2</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the section 'What conservation objectives might be applied to the site?' the 2<sup>nd</sup> iteration report suggest this site 'May be a reference site – although not confident/knowledgeable enough to confirm'.</b></p> <p><b>As a reference site would complete restrict all activities stated here, in the 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> iteration report please add: Aggregate Industry, Renewable Industry and the Crown Estate. These key stakeholders do not 'strongly object' to this boundary until the management restrictions on industry are made clear.</b></p>
--------------------------------	----------	--	--	--	--	--



<p><b>NG2.4</b> <b>(Linc Hub)</b></p>	<p>X</p>			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays <b>Statoil &amp; Statkraft Round 2 Sheringham Shoal Windfarm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£945million in capital investment  220,000 households powered by renewable energy  £120million a year in revenue from electricity generation  450,000 tonnes of CO2 reduction  10,000 tonnes of SO2 reduction  3,100 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>There are existing active cables and pipelines within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts for communications and oil and gas.</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the 'What activities at the site might need management?' section in the 2nd Iteration report please add: Wind farms, cables and pipelines</b></p> <p><b>In the 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report please add: Renewable Industry and the Crown Estate. These stakeholders do not support this boundary until the management restrictions on industry are made clear.</b></p>
<p><b>NG2.3</b></p>		<p>X</p>		<p>Request that current disposal sites not be restricted, displaced or require additional mitigation.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Brest Sand and West Sand Disposal Sites</p>	<p><b>In the 'What activities at the site might need management?' section in the 2nd Iteration report please add: Disposal Sites</b></p>
<p><b>NG2.2</b></p>			<p>X</p>		<p>There are existing active cables and pipelines within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts for communications and oil and gas.</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p>

NG2.1	X			<p>Request to avoid windfarms and for a 500m-1km buffer zone to be applied to the boundary of the MCZ to avoid impact on renewable industry.</p> <p>Request for clarity on level of restriction of cabling activity that will be needed for the BSHs/FOCI being protected.</p> <p>Request to avoid high value aggregates area and consider a buffer zone to reduce potential impacts from plumes.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive.</p>	<p>Overlays the westerly section of the <b>Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm Site</b> (area closest to land) and also <b>the cable corridor</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£21.6billion in capital investment  5million households powered by renewable energy  £2.8billion a year in revenue from electricity generation  10million tonnes of CO2 reduction  240,000 tonnes of SO2 reduction  72,000 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>Overlays part of <b>Eon Round 1 Site Scroby Sands</b> which may cause operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <p>£180million in capital investment  42,000 households powered by renewable energy  £24million a year in revenue from electricity generation  86,000 tonnes of CO2 reduction  2,000 tonnes of SO2 reduction  600 tonnes of NOx reduction  Many jobs losses and failure of UK Gov't meeting EU Climate Change targets</p> <p>There are existing active cables and pipelines within this MCZ. Any restriction to operation / maintenance of the cables is likely to have significant economic impacts for communications and oil and gas. Additional cables will be required for Round 3 Site</p> <p>The area overlaps the Galloper Round 2.5 cable route to the proposed land fall at Sizewell and this potentially effects on the ability for consent.</p> <p>Borders several aggregate extraction sites with production licences: Great Yarmouth Extension. Overlays Barley Picle Aggregate Option Licence</p> <p>Overlays three separate high value aggregate resources areas worth £3.4million per km2, £8.55million per km2 and 10.8million per km2.</p> <p>There is a closed Disposal Site</p>	<p>Assumption that cabling and pipeline works are permitted however clarity required on additional levels of mitigation required</p> <p><b>In the 'Are there blocks to reaching consensus?' section in the 2<sup>nd</sup> Iteration report please add: Aggregate Industry, Renewable Industry and the Crown Estate. These key stakeholder do not 'strongly support' this boundary until the management restrictions on industry are made clear.</b></p>
-------	---	--	--	--	--	---

<b>BAI 1_E over Zone 5 Round 3 Site (EE Hub)</b>	X			Request to prioritise other BAIs or remove from iteration. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.	Overlays a significant portion of the <b>Scottish Power Renewables/Vattenfall Round 3 East Anglia Wind Farm Site</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:  £21.6billion in capital investment 5million households powered by renewable energy £2.8billion a year in revenue from electricity generation 10million tonnes of CO2 reduction 240,000 tonnes of SO2 reduction 72,000 tonnes of NOx reduction Many jobs losses and failure of UK Gov't meeting EU Climate Change targets	<b>The Crown Estate support and endorse the letter sent by SPR to the Chair of the StAP regarding the choice of other alternative BAIs sent 10/11/10</b>
<b>BAI 1_B over Aggregate Site (EE Hub)</b>	X			Request to prioritise other BAIs or remove from iteration. There are alternative habitats present in the North East Hub that meet the ENG targets that would not have as significant economic impact as this BAI.	Overlays an important aggregate sites: Great Yarmouth Production License, Lowestoft Extension Application and option Licenses  Overlays a high value aggregate resource area. For every km2 of aggregate resource sterilised by MCZ restriction creates a loss of up to £13million perkm2	

<p><b>BAI 2_E, 2_G, 2_F over aggregate option and Galloper Round 2 Windfarm(EE Hub</b></p>	<p>X</p>			<p>A request was agreed by stakeholders at the EE Hub meeting and recorded in the minutes to adjust the boundary of 2_G to follow the lines of the 2_F which would result in the area avoiding the Round 2 Galloper Extension Site. This has not been adhered to in the report/GIS shapefile distributed and TCE request that 2_E be amended as agreed.</p> <p>TCE request that this boundary be further amended to avoid the North Falls East Area 501 aggregate application area and create a 500m-1km buffer around the BAI.</p> <p>Applying these changes removes all expected impacts stated opposite TCE likely to change opinion to positive and SUPPORTIVE of this BAI.</p>	<p>Overlays part of the <b>SSE/RWE/Npower Renewables Round 2.5 Galloper Extension Wind Farm</b> which will cause installation and operation constraints. Depending on level of restriction, potentially a loss of up to:</p> <ul style="list-style-type: none"> <li>£1.3billion in capital investment</li> <li>530,000 households powered by renewable energy</li> <li>£200million a year in revenue from electricity generation</li> <li>720,000 tonnes of CO2 reduction</li> <li>17,000 tonnes of SO2 reduction</li> <li>5,000 tonnes of NOx reduction</li> <li>Many jobs losses (up to 100) and failure of UK Gov't meeting EU Climate Change targets</li> </ul> <p>Overlays an aggregate application area North Falls East (Area 501).</p> <p>For every km2 of aggregate option area sterilised by MCZ restriction creates a loss of up to £4 million per km2</p>	<p>Concerns over validity of BSH data here as it conflicts with SSE and RWE data</p>
--	----------	--	--	---	---	--

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                      Maeve Lee

Sector represented      Protected Landscapes

Regional Hub              North East

Please explain briefly how the feedback you are presenting was collected:

Feedback was gathered from personal and email communications

Please indicate how many people you have been able to discuss this feedback with:

3

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

Support is satisfactory as this sector is small therefore easier to collate opinions. Time in this current climate is an issues with most stakeholders.

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG 2.19			X	<p>From liaising with some stakeholders it seems that most are happy the way that the MCZs are being detailed thus far. Durham Heritage Coast understands that the level of designation on this coast would be small but as it is a progressing landscaped it would be good to see part of the coastline (inshore areas in particular) protected from overly destructive processes particularly as it is an evolving area still recovering from the degradation caused by decades of coal mining. There has been limited interaction with stakeholders further south of Durham but these areas may already feed into the North Yorkshire and Humber hub. Northumberland Coast AONB have already heard from Natural England on the progress of Net Gain and are satisfied that there is a possible site designated off their coast.</p>		
NG 2.20			X			
NG 2.21			X			
NG 2.22		X				
NG 2.15		X				
NG 2.16		X				
NG 2.17		X				
NG 2.18		X				

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG

**Feedback following second iteration (dMCZ) submission to SAP – October/November 2010**

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name Jonathan Green

Sector represented Northumberland Sea Fisheries Committee

Regional Hub North East

Please explain briefly how the feedback you are presenting was collected: Discussions with colleagues

Please indicate how many people you have been able to discuss this feedback with: 6

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

I will try to discuss issues raised during feedback process with a number of SFC members to gain greater insight into overall opinions

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
2.22	/			This is a large site running mainly East to West. Possible individual socioeconomic effects may be reduced if it ran North to South. The current site is likely to affect more of those individuals that operate in the North. By running the site north to South this may alleviate this.	Displacement of fishing activity	If suggested adjustments cannot be made as it is a large site could it not be split into two if suitable habitat exists elsewhere in the hub area ideally further South?
2.21	/			If site designated for low energy circalittoral rock does site need to be so large? Could the sub tidal coarse sediment and sand be included elsewhere?	Displacement of fishing activity	In submission to SAP stated on page 74 "potting is important". While not experts in offshore fishing there is little awareness that these ground are extensively used by the Northumberland Potting fleet
2.20		/		Does site need to be joined to EMS, stakeholders in this area may feel that they are being unfairly targeted believing that there will be no areas free from some restrictions. Maybe shift inshore edge outside of 6 or 12 miles.	Displacement of fishing activity. Potential need for increased sea patrols and an additional monitoring requirement, particularly if required to operate out to 12 miles. There will also be increased costs to carry out these duties	In submission to SAP on page 72 – just for clarity while foreign vessels can fish inside of 12 miles they are excluded within the six mile limit.



2.19			/		Displacement of fishing effort. Potential need for increased sea patrols and monitoring. There will also be increased costs to carry these duties.	In submission to SAP stated on page 68 "No trawling inside of 3 Nautical miles" This is inaccurate small (less than 11.59m) single rig trawlers can fish inside of three miles. Within the NSFC district (out to 6 miles) no multi rigging is permitted.
2.18	/			If the area around this site is ultimately designated as a SAC (highly likely) then if it comprises habitat of the same type as other proposed MCZ's, then surely these will need to be reduced otherwise governments proposed % targets will be exceeded. What measures are in place to enable this?	Displacement of fishing activity	

						<p>There was strong agreement that designation particularly in offshore zones should only be made after extensive consultation with those using those zones. To date this has not been accomplished, while accepting the NET Gain team has endeavoured to make contact greater efforts need to be made not only to get more industry representatives to attend Hub meetings but also greater face to face meetings. There was also strong agreement that while “best scientific advice” was being used, it continues to be woefully poor and likely to be inaccurate. In many cases this may lead to sites being designated in the wrong locations. Both of the above points could be achieved if more time was given to the designating procedure. At present it is seen as rushed and trying to meet a timetable that will only result in poor site designation, this cannot be the best scientific way of establishing MCZ’s</p>
--	--	--	--	--	--	---

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)  
or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



**Feedback following second iteration (dMCZ) submission to SAP – October/November 2010**

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name **Hester Clack** .....  
Sector represented **Natural England in East of England (Norfolk and Suffolk)** .....  
Regional Hub **East of England** .....

Please explain briefly how the feedback you are presenting was collected: .....

**I held a meeting with Marine Colleagues and our Norfolk and Suffolk Area Manager – gave a short presentation on the process we went through to get to the iteration, we then went through the 5 large maps (dMCZs, BSHs, FOCI, Marxan) I then went through the detailed info in the Iteration report for those sites which fall in our area. Collected feedback.**

Please indicate how many people you have been able to discuss this feedback with: **8** .....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

**No**.....  
.....

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.1		Not sure at this stage		<p>If the MCZ boundary goes all the way to the High Water Mark it will bring in a host of other issues re management – ie local authorities working on shoreline management plans etc. If possible should consider if the MCZ boundary can be below Low Water – if this makes ecological sense.</p> <p>In light of the above should the proposed estuaries be separate dMCZs?</p>	<p>It should be acknowledged that the Hub has put forwards a dMCZ which overlays one section of the new SPA. This is mainly as the area does contain a variety of Broad Scale Habitats and it seemed a practical and sensible option. The reason for this decision should be highlighted as those stakeholders involved in the consultation of the SPA may be concerned by this addition to the area.</p> <p>There are some views from SNCBs evidence team that MCZs should not overlap existing designated areas – need to clarify this further – but we understand that it is up to the Hubs to decide on a site by site basis if this is a good approach.</p>	<p>How and where will we incorporate the Blue Mussel bed at Winterton/Horsey?</p> <p>The seals at Horsey do not enjoy any protection – is there an opportunity to include these in a designation? We are aware that seals are not a target features of MCZs - however they are a significant feature of the coastline here hauling out and pupping on the beaches and feeding in the sea and attracting thousands of visitors a year.</p>
NG2.1 Cont.				<p>The starlet sea anemone records in this site in Suffolk are in Saline Lagoons, above the HW mark. How these should be incorporated should be discussed. NE evidence team has confirmed that saline lagoons should be part of the marine system as are sea water fed.</p>		

<p><b>NG2.1 cont.</b></p>				<p>Consider extending the site north to include all of Scroby Sands and surrounding waters. These are the main feeding grounds for the Little Tern. This species is protected on the beach (SPA) but the offshore sandbanks are not protected – yet are the main feeding ground for the 10% of the UK population which breeds along the coast. As the sand at Scroby continues to accrete the Little Terns may also breed on the bank.</p> <p>However some work is also going on looking at extending the existing SPA seawards (by Lou Burton in NE). This is by no means a definite outcome. Hester Clack to keep up to date with progress on this with Lou.</p>		
<p><b>NG 2.2</b></p>			<p>X</p>	<p>Care with the detail of the data for the Subtidal and Littoral Chalk HOCI. A colleague, who has dived the area, notes that there are clay exposures within the chalk too plus cobbles and boulders.</p> <p>There also may be Subtidal chalk further out – but covered by sand.</p>	<p>Concern that a reference area for the subtidal and littoral chalk in this area would be very contentious! Need to consider if the chalk data in other Hub areas would be better as a reference area.</p>	

NG 2.3			x	<p>Does the site include the saline lagoons at Cley and Salthouse? Startlet Sea Anemones have been recorded in this area this summer. <b>Hester to check any current protection to Starlet Sea Anemones.</b></p> <p>Discussion in the Iteration report for this site mentions West Runton geology – however we do not think that West Runton falls within this site boundary. It is in NG 2.2.</p>		<p>The Peat and Clay exposures at Titchwell currently do not have any protection – should definitely be included in the dMCZ and given a Conservation Objective. Current time limited license exists for collecting seed mussel – no landing on top of site.</p> <p>Please make more clear the start and end of dMCZs 2.2 and 2.3 and 2.2 and 2.4. We feel that 2.3 should end at Cley. This would mean that there is no chalk in 2.3, but only in 2.2. 2.2 and 2.3 would then butt up against one another – which is OK. NG2.4 should also be made more clear.</p>
NG 2.4			x	<p>Presume further discussion will take place on whether 2.4 or 2.2 should go forwards in the future – do not need both.</p>		

**Overall comments on sites in the East of England, including the Wash.**  
Need to be able to justify why much of the coast line has been put forwards – and why a gap exists around the East Norfolk section. (Presence of features).

Care that rationales given for the dMCZs often seem to be based more on the ability of operations to continue, rather than ecological reasons. Though this has lead to a good level of consensus being achieved at this stage. Also care that the Sensitivity Matrices, Prism and Pisa tools are not used too bluntly – benchmarks and caveats need to be fully understood by stakeholders to ensure that the potential impact of designations on activities are as realistic as possible.

**Overall comments on the whole Net Gain area.**

If the MCZ boundary goes all the way to the High Water Mark it will bring in a host of other issues re management – ie local authorities working on shoreline management plans etc. If possible should consider if the MCZ boundary can be below Low Water – if this makes ecological sense.

Care with version control as the maps will be circulated widely and then be updated.

**Table headings** – what does ‘Within site replication (40-80km) really mean?

‘No of occurrences’ – again what equals an occurrence? (What’s the difference between ‘present’ and 4 for example)?

Key on the Species FOCI map – not enough distinction between the duplicated symbols (I think they show newer and older data for some species).

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name **TOM MANNING**  
Sector represented **MARINE CONSERVATION (NATURAL ENGLAND)**  
Regional Hub **THE WASH AND LINCOLNSHIRE COAST**

Please explain briefly how the feedback you are presenting was collected:

**Comments invited from NE colleagues on 2<sup>nd</sup> iteration progress for potential MCZ locations at The Wash and Lincolnshire Coast.**

Please indicate how many people you have been able to discuss this feedback with: **5 people**

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector? **NO**



Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.4				Site verification work may contribute positively to any necessary adjustments to this dMCZ with reference to the conservation of the site or to improve potential management of the area.	N/A	<p>The site was selected by RSG primarily for highly representative examples of infralittoral &amp; circalittoral rock broadscale habitats ie. chalk reef and associated habitat areas - It is important to note that the draft site boundary area comprises a mosaic of habitat types found here for example inshore eg inshore sublittoral coarse sediment, which contributes to the ecological integrity of the area as a whole .</p> <p>The area could also provide for a possible favourable location of a scientific reference site for representative broadscale habitat types (see EoE comments)</p>
NG2.5				This dMCZ Site identified by the RSG indicates a degree of overlap in respect of the IDRBNR Natura 2000 MPA designation; GAP analysis output, further SNCB advice and StAP comments should inform possible adjustment to improve conservation benefit and potential management .	N/A	<p>This area is primarily representative of sublittoral mixed sediment and sublittoral Coarse Sediment areas in addition to containing sublittoral sand and biogenic reef.</p>

NG2.5				RSG may further refine boundaries to include but not be limited to the highly representative habitat areas for which this site has been identified.	N/A	<p>It should be noted that the ecological interest features referred to for dMCZ designation are benthic habitats types, which are representative of the underlying substrate types, in particular sublittoral coarse sediment, mixed sediment &amp; sublittoral sand habitat. These highly representative habitats formed the ecological basis for designation in decisions reached by the RSG and for the purposes of boundary drawing.</p> <p>The Race Channel was considered for example to be representative of sublittoral coarse, mixed or sandy sediment located between docking Shoal and the Race Bank sandbank features. With reference to the extension of site 2B and aligning with site boundary of adjacent combined 1A and 3B, it is important to note that the agreed boundary was considered to include highly representative areas of sublittoral mixed sediment within the Inner Dowsing dSAC.</p> <p>The site is also likely to contain Habitat for Sabellaria spinulosa HOCl.</p> <p>The dMCZ could provide for co-location of designated areas with renewable sector.</p>
NG2.7				Data provision for the Lincolnshire Coast may indicate further areas of additional ecological importance to contribute to COs and potential management measures.	N/A	This site is primarily representative of areas of Inshore sublittoral coarse sediment and sublittoral sand along the Lincolnshire Coast, with particular reference to the additional ecological importance of the area as fish spawning grounds.

NG2.8				No further comments at this point	N/A	This area comprises primarily sublittoral mixed sediment areas between the Humber Estuary and Silver Pit. The area identified is a representative of the above broadscale habitat type and a viable dMCZ for that habitat type.
NG2.9				The site boundary was delineated in respect of the geomorphological feature. Conservation/management benefits will accrue from delineating an agreed margin to the geomorphological feature and the representative broadscale habitat areas.	N/A	The Silver Pit was considered as highly representative of sublittoral mixed sediment and coarse sediment areas with additional ecological importance at both sloping approaches to the feature, the canyon walls and deeper muddy areas.
NG2.10				No further comments at this point	N/A	This proposed dMCZ was identified for areas of sublittoral coarse and mixed sediment
NG2.11				JNCC may wish to comment on offshore sites.  It is anticipated that the StAP may provide comment on the network design principle of connectivity.	N/A	This site is representative of offshore sublittoral Coarse Sediment areas & sublittoral Sand. Seazone bathymetry maps were used to align underlying geomorphological features with representative broadscale habitats for the purposes of boundary drawing.  JNCC may provide further comment on offshore sites.  Connectivity between site options are an important secondary consideration.
BAI - Peat and Clay Exposures in the Wash				Provide stakeholders with regional profile data on feature extent and viability criteria for this HOCl feature.		NB. Potential dMCZ must meet the network design principle of viability for this HOCl feature, which is provided by feature specific recommendations for species and habitats of conservation importance. This potential dMCZ may be brought forward subject to Gap Analysis output.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name Emma Brown .....

Sector represented Natural England – Yorkshire and Humber Region .....

Regional Hub Yorkshire and Humber .....

Please explain briefly how the feedback you are presenting was collected: Discussion with team members .....

.....

.....

.....

Please indicate how many people you have been able to discuss this feedback with: 6 .....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

.....

.....

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			

NG2.12			<p>Part of the site incorporates and existing prohibited trawl zone, which means that byelaws are already in place.</p> <p>Could check if the dMCZ includes (or could include) 'The Binks' – a geological feature – moraine ridge that protects Spurn Peninsular from erosion</p> <p>The intertidal area may prove difficult to manage – this should be considered by stakeholders in more detail with advice from NESFC and the MMO.</p>	n/a	<p>There is more variation in the habitat than there appears to be on the Eunis L3 Map and the area is used as a spawning and nursery ground by a number of fish species. Examples of cobble reef and sabellaria reef have been identified within the area.</p> <p>The area is already a prohibited trawling area and there is a byelaw already in place which is enforced by NESFC. (NESFC will have existing data on activities occurring in the area.) Potting for lobster and crab occurs at a relatively high intensity. NESFC have collected a large amount of data on the lobster population within the area in order to support the Marine Stewardship Council (MSC) accreditation of the fishery.</p> <p>Netting also takes place along the Holderness coast and the seabass fishery has recently achieved MSC accreditation which indicates that this fishing is occurring at a sustainable level and will also mean that there is information available about the stock (NESFC). Recreational sea angling also occurs within the proposed area.</p> <p>Spurn Point is an important area for Seabirds (as is the Humber Estuary SPA as a whole) and consequently it is an important area for bird watching/ nature based tourism.</p> <p>The Holderness coastline is subject to a high rate of erosion (refer to the shoreline Management Plan for this region for further details). This coastal erosion and associated seabed erosion is of high importance to adjacent coastlines and the wider area of the Southern North Sea, (including the Humber Estuary SAC, SPA, SSSI and Ramsar site). Consequently, any developments in this area are required to consider the potential of disruption of sediment flow into the Humber Estuary as part of their Environmental Impact Assessments (EIA).</p> <p>Holderness coast supports landfall for numerous energy pipelines and cables and as such is of high importance to the UK's energy supply. (The EIAs for these cables could provide additional information on this area.) The area is also likely to support caballing for Offshore Windfarms.</p> <p>With reference to the progress report - Salt mining occurs at Alkborough in order to form gas caverns (on land) and there is an associated brine diffuser offshore. This is closely monitored by the EA and is deemed to be low risk. (Plans for an additional diffuser – have completed the scoping stage of the EIA process.) I think this</p> <p><i>“After checking the sensitivity matrices it was felt both potting and angling would remain unaffected”</i> – Need to be careful that the outputs from the PRISM/PISA tool aren't taken too literally and be mindful of the caveats. Please see the additional guidance from Eddy Mayhew (NE).</p>
--------	--	--	---	-----	--

NG2.13			Stakeholders could consider the potential benefits of collocation with windfarms at this site.	n/a	<p>This site mainly falls outside of 12nm so JNCC would be best placed to advise from an SNCB point of view</p> <p>This is a prime offshore potting area. Scallop dredging has recently taken place in this area.</p>
NG2.14			<p>Reference points on land could be used to help draw boundary lines to that people can easily identify when they are within the area (from on land and at sea)</p> <p>Tourism is very important to the local economy and is a main source of income for Filey – the IA should consider this (possible benefits?)</p> <p>The site may not meet the viability targets – seek advice from the SAP.</p>	n/a	<p>Stakeholders proposed this site in order to capture examples of high and moderate energy intertidal rock features. However, this site incorporates a mosaic of habitats so it is important to decide which of these habitats should be included as features of the MCZ.</p> <p>Includes interesting geological/ geomorphological features e.g. Filey Brigg which is already a geological SSSI. An MCZ may offer complementary protection to these features as they extend beneath MHWS.</p> <p>Robin Hood’s Bay is already an SAC for its vegetated sea cliffs (terrestrial) so an MCZ designation in this area might be complementary.</p> <p>The area has been studied in the past, particularly by University Students (North Yorkshire and Cleveland Coastal Forum may be able to provide additional information).</p> <p>Commercial fishing activity in the area includes - Potting and netting (Net limitation order to be reviewed in 2012) Recreational Angling and kayaking occur at a relatively high level. Shore collecting also occurs.</p> <p>With reference to the Progress Report:</p> <ul style="list-style-type: none"> <li>- <i>“Dredging and trawling should be stopped at the site”</i> this is not really a conservation objective, it is a management measure. (N.B. It is important to include justification for this type of statement.)</li> </ul>



NG2.15				Part of the site incorporates and existing prohibited trawl zone, which means that byelaws are already in place.	n/a	<p>Site comprises a mosaic of broad scale habitats with a good level of variability. Stakeholders proposed this site in order to capture examples of high and moderate energy infralittoral rock, so again it is important to highlight with habitats are to be regarded as 'features' of the dMCZ.</p> <p>NESFC have recently mapped the habitat within the prohibited trawl zone (If possible, this information should be obtained by Net Gain)</p> <p>Heavy trawling occurring outside of the prohibited trawl zone.</p> <p>The potash mine would require further consideration – it would be important to understand the likelihood and potential extent of subsidence.</p> <p>With reference to the Progress Report:          -Not sure if there are Oil and gas pipelines in the area – please check          -Not sure that it was this site that the group did not have confidence in the data for – this was site NG2.16          -Which feature is moderately sensitive to potting and creeling?</p>
NG2.16					n/a	<p>This site was proposed for the moderate energy circalittoral rock bsh. There was a low level of confidence in the underlying data for this site and a strong feeling from stakeholders that this habitat type was incorrect. I have raised this with JNCC and should be able to provide additional advice prior to the next Hub meetings.</p>
NG2.17					n/a	<p>Please seek advice from JNCC in relation to the GAP analysis for the pSAC. In the absence of the GAP analysis for the \Dogger Bank pSAC, this site was put forward for the subtidal sand feature. Stakeholders may therefore wish to revisit this to consider the suitability of the dMCZ in relation to the subtidal coarse sediment feature.</p>

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)  
or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                      Aisling Lannin .....

Sector represented      Natural England north east regional office .....

Regional Hub              North East.....

Please explain briefly how the feedback you are presenting was collected:

A meeting was held in our office with marine advisers, coastal adviser, team leaders, marine team delivery leader and the regional Marine and Business manager during which I gave an explanation of progress made in iteration 2 and showed maps of suggested sites.

Please indicate how many people you have been able to discuss this feedback with: Seven.....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

No thanks .....

.....

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.18			x			
NG2.19			x		It is expected that this site would entail complex management as the number of activities in this area is high, ranging from fishing, angling, recreation, dumping, anchoring, shipping, renewable, cables and more. Part of the adjacent coastal and land area is currently undergoing stakeholder consultation to form a strategic management document and might benefit the management of an MCZ sited close by.	
NG2.20			x	This site could benefit from the management expertise, implementation and group already in existence for the Berwickshire and North Northumberland Coast European Marine Site and also from consideration of a cross border connection to any potential Scottish MPAs.		
NG2.21			x			
NG2.22			x			

						In other regions estuaries have been designated for additional ecological importance and FOCI such as smelt and eel using information submitted by the Environment Agency. This information is pertinent for some of the estuaries in this region too and should be considered at the next hub meeting.
						Further discussion of sites off the Durham coast should be explored in the next hub meeting as time did not allow this at the plenary for the second iteration.
						The outputs of the pressures and sensitivities matrix come with caveats and although this makes it more complicated it is important that everyone is fully aware of the implications of using the matrix and that it is used correctly.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG



**Feedback following second iteration (dMCZ) submission to SAP – October/November 2010**

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name ..... *LINDA BOURNE* .....

Sector represented ..... *MOD* .....

Regional Hub ..... *LINCOLNSHIRE* .....

Please explain briefly how the feedback you are presenting was collected: ..... *DISCUSSIONS WITH LINE MANAGEMENT* .....

..... *AND OTHER RANGE COMMANDERS* .....

.....

Please indicate how many people you have been able to discuss this feedback with: ..... *15* .....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

..... *No* .....

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.7		✓			Restrictions in training	
NG2.3					restricted for front line duties. Restrictions in towing.	We need to be able to continue servicing bows and the barge in 2.7 anchored 4.5 km SW shore. Continue to drop practice ordnance onto sea target - no high explosive content. Continue to use the ship targets in 2.3 and repair sand targets.

When complete, please return to info@yhsg.co.uk  
or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



## Feedback following second iteration (dMCZ) submission to SAP – October/November 2010

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name                      Rederscentrale  
Sector represented      Belgian Fishing Fleet  
Regional Hub

Please explain briefly how the feedback you are presenting was collected:

By comparing the potential Marine Conservation Zones with the VMS-data of the Belgian fishing fleet from the past four years. The outcome of this comparing was being discussed with members of the board of the Producers Organisation Rederscentrale.

Please indicate how many people you have been able to discuss this feedback with: 18

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

Site ID	Opinion of potential sites (tick appropriate box)			Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
	Negative	Neutral	Positive			
NG2.1	X				Loss of fishing grounds	
NG2.2			X			
NG2.3			X			
NG2.4	X				Loss of fishing grounds	
NG2.5	X				Loss of important fishing grounds	
NG2.6	X				Loss of fishing grounds	
NG2.7		X				
NG2.8	X				Loss of important fishing grounds	
NG2.9	X				Loss of important fishing grounds	
NG2.10	X				Loss of important fishing grounds	
NG2.11	X				Loss of important fishing grounds	
NG2.12			X			
NG2.13	X				Loss of important fishing grounds	
NG2.14			X			
NG2.15			X			
NG2.16	X				Loss of fishing grounds	
NG2.17	X				Loss of fishing grounds	
NG2.18	X				Loss of fishing grounds	
NG2.19			X			
NG2.20		X	X			



NG2.21		X				
NG2.22	X				Loss of fishing grounds	

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG

**Minutes of the Meeting with The Sheringham Fishermen's Association on 05/11/2010  
7pm, Lobster Pub, Sheringham**

**Present:** Tammy Stamford (NG) and 8 members of the Sheringham FA

1. The group were given a brief project update and were then showed fishermap validation charts. The group agreed this was a true representation of the grounds fished by their fleet. 7 fishermen signed the validation sheet.
2. dMCZ and BAI maps were shown to the group and the following issues were raised/discussed:
  - Sediments in the area are continually changing.
  - Larger boats would be affected by a cap on the number of pots than the smaller boats because they don't work that many.
  - In support of zone if allowed to continue their activities as normal. Methods are predominantly potting and gill nets.
  - Their range is restricted by the weather and the size of their boats, so the management measures selected would be crucial to the survival of the fleet.
  - The group feel that there should be compensation for anyone put out of business.
3. 7 fishermen signed to say they had viewed the charts and had the opportunity to express their views.

**Minutes of the Meeting with the Caister Inshore Fishermen's Association on 08/11/2010  
7:30pm at Caister Community Centre**

**Present:** Tammy Stamford (NG) and 7 members of the Caister Inshore FA.

1. The group were given a brief project update and were then showed fishermap validation charts. The group agreed this was a true representation of the grounds fished by their fleet. All 7 fishermen present signed the validation sheet.
2. dMCZ and BAI maps were shown to the group and the following issues were raised/discussed:
  - Not seen undulate ray in this region for a long time.
  - If longlining, potting and netting ok in NG2.1 then wouldn't affect fleet and the Association would support the zone. Would not support the zone if their activities were totally banned.
  - Concerns about the damaging effects of wind farms.
  - Feel that people have a right to fish in English waters.
  - Feel there should be compensation for fishermen that are affected.
  - Anchors of tankers very damaging.
  - Static nets are fixed with a very light anchor.

**Minutes of the Meeting with the Lowestoft Fishermen (Anglian FA) on 08/11/2010**  
**11am Europa Cafe, Lowestoft**

**Present:** Tammy Stamford (NG) and over 10 fishermen.

1. Members of the group who had not seen the fishermap validation charts were shown copies.
2. dMCZ and BAI maps were shown to the group and the following issues were raised/discussed:
  - General support for the BAI offshore along the NG boundary (labelled as BAI 3 on the acetate accompanying the original notes pages) as the group felt this area would not affect local fishermen.
  - Concerns about tankers and anchoring. Large, heavy anchors that damage the sea-bed dramatically.
  - Recommend the area off Sea Palling/The Wold as good conservation area because there are fish spawning grounds present. Also the area near South Winterton Ridge, North of Smith's-Knoll would be a good area to conserve.
  - Not in support of NG 2.1 if trawling is banned.
  - Must differentiate between different types of trawling – there are many. They all have different impacts.
  - Not seen an undulate ray anywhere in the region for years. Do not think it is present in this area.
  - Worried about underlying data. Would like to know where all the data/evidence comes from.
  - Conservation zones seem to be placed exactly where the fishing activity is. Zone NG 2.1. of particular relevance to Lowestoft Fleet.
  - Doubts about whether cables and dredging can be restricted in an MCZ. Would like to see a fair playing field, with all sectors being treated in the same way. It would be unfair to restrict fishing unless dredging was also restricted.
  - Suggest dredging areas near BAI 1 ideal conservation area. They were previously productive, ecologically diverse areas and now they have been destroyed. Would benefit from restoration.
  - Concerns about the impact of wind farms on fish populations. Not been able to catch skate around windfarms since their construction.
  - European fleet must be treated in the same way – same rules and regulations should apply to everyone.
3. 8 fishermen signed the signatures sheet to say they had seen the charts and had an opportunity to express their views.

**Minutes of the Wells and District Inshore Fishermen's Association Drop-In Session  
10/11/2010 at The Golden Fleece, Wells-next-the-Sea**

**Present:** Tammy Stamford (NG), 1 member of the Association (R J Harris) and a Charter Skipper

1. Fisherman validation charts were shown. The fisherman present thought it was a good representation of the activity of the Wells fleet, but not 100% accurate so would not sign a validation sheet. Mr Harris provided a number of corrections and agreed to sign the correction form.
2. dMCZ and BAI maps were shown and the following issues were raised/discussed:
  - Shrimping in the Wash and zone NG 2.3 and outside Lowestoft (NG 2.1).
  - Dredging areas off Lowestoft used to be good fishing grounds, but have been destroyed and would therefore benefit from protection.
  - Why not designate wind farm areas as conservation zones.
  - Larger boats do more damage than the smaller inshore fleet.
  - 10 working boats in Wells.
  - Feel that larger boats favoured by government when activity of smaller vessels is more sustainable.

# Sheringham Shoal

by Scira Offshore Energy

Scira Offshore Energy Limited  
Statoil UK Ltd  
One Kingdom Street  
London W2 6BD  
United Kingdom

T: +44 (0) 207 7667777  
F: +44 (0) 207 7667862

Steve Bernard  
Stakeholder Manager  
Net Gain  
The North Sea Marine Conservation Zones Project  
The Deep Business Center  
Tower Street  
Hull, HU1 4BG

Date: 11 November 2010  
Subject: **Proposed Marine Conservation Zones - Feedback**

Dear Mr. Bernard

We would like to thank you for the opportunity given to the Sheringham Shoal Offshore Wind Farm to partake in the discussions around establishing future Marine Conservation Zones (MCZs) in the Greater Wash area. We consider ourselves a prudent renewable energy operator and are committed to protecting the environment and ecosystems where we operate. We have recently reviewed your Lincolnshire and the Wash Regional Hub meeting 3 Workshop Report as well as your October 2010 Progress report and have the following comments:

- 1- We highly support the recommendation not to have MCZ coexisting with wind farms, until the full impact of wind farms on the marine environment is understood. Rather, identify the wind farms as voluntary MCZs if seen necessary.
- 2- Any identified MCZs should protect the right for the operator to successfully operate and maintain a wind farm. Therefore MCZs should not affect the wind farm's ability to operate vessels in the field, transport substances and most importantly utilize jack-up barges as well as heavy lift cranes to operate and maintain the field.
- 3- Wind farm vessel activity should not be restricted, rather identify a set of requirements and or best practice for vessel operations and maintenance. We believe that careful and responsible vessel operations, on Sheringham Shoal have no impact on the marine environment special characteristics being considered for protection as an MCZ.

We hope that the points above are communicated to the relevant teams involved with identifying the MCZs. We would also appreciate it if we could be invited to participate in any future meeting related to identifying MCZs in the Wash Area as well as East of England.

Sheringham Shoal is an Offshore Wind Farm located off the North Norfolk coast in the UK. It is owned by SCIRA Offshore Energy Ltd. which is a UK based subsidiary of Statoil ASA and Statkraft AS. You can find more information about the farm on [www.scira.co.uk](http://www.scira.co.uk).

Yours sincerely,



Nachaat Tahmaz  
Health, Safety and Environment Manager  
Tel: +44 7584 682 501

## **North East Stakeholder Feedback (dMCZs, 2nd Iteration)**

### **Collated feedback presented via local Liaison Officer - January 2011**

#### **Zone NG 2.20**

- The area covered by NG2.20 is fished by The North East Fishing fleet - especially vessels from North Northumberland.
- The Zone NG2.20 is ok as long as static fishing can continue to be operated within the site - this area is important for the earnings of the local inshore fishing fleet.
- Totally against any restrictions on fishing in this proposed zone. It was suggested that the area covered by the zone was vital to the local mobile fishing fleet as well as the vessels from Eyemouth and other Scottish and Irish vessels which fish this area on an annual basis (trawling, static fishing and scalloping).
- Totally against any restrictions on trawling in these areas NG2.20 as it's a very important ground for the fleet.
- The closeness of the proximity of NG2.20 to the Farne Deeps area was a concern - it was suggested that parts of it were located on important trawling areas close to the Farne Deeps.
- Zone NG2.20 is fished both during the summer and winter months. If potting is restricted in this area it will have a massive displacement of gear and will affect the livelihood and earning capacity of many local fishing communities.
- There is a lot of static gear fished in the NG2.20 area and if potting and salmon netting (T-nets) are regulated it will have a massive effect on the local fishing communities.
- If for any reason potting is stopped in the NG 2.20 area 50% or more of the static gear boats from Northumberland (Boulmer, Craster, Amble, Seahouses) will go out of business.
- There are concerns that management measures could progress to impact on static fishing in years to come.
- The dMCZ is ok as long as static gear fishing methods are not restricted in the site and that in years to come further management measures are not brought in restricting static fishing (potting, netting & lining) in the area.
- Angling should be able to continue.
- Recreational angling should be put on a quota.
- It was suggested that heavy mobile fishing gear could be potentially damaging to the habitat in the area and specific management may need to be looked into.

#### **Zone NG 2.22**

- Concern about the large area of seabed taken up by this zone.
- It was mentioned that NG2.22 had the Swallow Hole fishing area inside its boundaries which is an important commercial fishing area for vessels carrying out mobile activities.
- This area is far too big and should be made smaller - this area is fished by vessels from a lot of ports from Scotland down to Grimsby as well as from other countries such as Denmark –

it is an important area for all flat fish species as well as for nephrops and for cod/haddock/coley and numerous other species.

### **Zone NG 2.19**

- This area is heavily fished by vessels from a lot of the local ports. There is a lot of static gear fished in this area and if potting and salmon netting (T-nets) was to be restricted in the area it will have a massive effect on people's livelihoods and local communities.
- If for any reason potting is stopped in the NG2.19 area 50% or more of the static gear boats from Northumberland (Boulmer, Craster, Amble, and Seahouses) will go out of business.
- Due to the size of commercial fishing vessels traditionally worked within area NG2.19 they are restricted to how far they can work from the harbour (from an HSE aspect). Any restrictions placed on the local fleets which make them fish further from shore could seriously endanger lives.
- Totally against any restrictions on trawling in these areas - NG2.19 is a very important ground for the local North East fleet.
- Extending NG 2.19 out to 3 miles takes vital ground from the under 10m trawler fleet that tow for prawns on mud. It is vital that small boats need sheltered places to fish.
- Zone 2.19 is highly important for the potting and static gear fleet. If static fishing is stopped in this Zone the inshore fleet from the local area will be finished.
- 90% of the inshore fleet use this area, so consider moving it somewhere else that will not affect as many jobs and livelihoods.
- These grounds have been fished for generations and still are proving their sustainability - why change them?
- The best approach would be a 1 mile conservation zone in area NG 2.19 (if there has to be a zone in this area at all).
- It was suggested certain heavy mobile gear commercial operations by large vessels could be potentially damaging to the habitat in the area and specific management may need to be looked into.

### **General Comments for dMCZs in the North East**

- There has been concern over the size of the zones and the amount of sea bed which has been taken up as possible MCZs - do the sites have to be so large?
- It is of great concern that some areas are so close to many small coastal fishing communities that depend on fishing for their livelihoods.



## **Yorkshire & Humber Stakeholder Feedback (dMCZs, 2<sup>nd</sup> Iteration) Collated feedback presented via local Liaison Officer - January 2011**

### **Zone NG 2.12**

- This area is already prohibited to trawling so stakeholders were in favour of this area, providing that fishing with static gear would still be allowed.
- Commercial fishing restrictions on inshore MCZs (including NG 2.12) would result in severe financial hardship as the vessels which work this area are predominately under 10m and, for safety reasons, would not be able to fish further afield.

### **Zone NG 2.13**

- This proposed MCZ was the cause of much concern as both static and mobile vessels fish this area heavily. If management restrictions stop fishing in this area then there would be a large financial loss to the industry

### **Zone NG 2.14**

- Feedback for this area was restricted because although it was accepted that a large percentage of this area was intertidal the boundaries were hard to define because of the scale of the chart. Any future charts for this area were requested by all sectors to be produced on a scale that the boundaries would be easy to define.
- Commercial fishing restrictions on inshore MCZs (including NG 2.14) would result in severe financial hardship as the vessels which work this area are predominately under 10m and, for safety reasons, would not be able to fish further afield.
- Angling stakeholders were concerned that bait digging may be restricted in NG 2.14.

### **Zone NG 2.15**

- Most of this area has been prohibited to trawling since the early 1900's. Concern was voiced by stakeholders that if trawling was restricted to the area that has been added on the north side of the proposed MCZ that it would impede on the earnings of smaller vessels, as light trawling for soles is done in this area.
- Commercial fishing restrictions on inshore MCZs (including NG 2.15) would result in severe financial hardship as the vessels which work this area are predominately under 10m and, for safety reasons, would not be able to fish further afield.

### **Zone NG 2.16**

- This proposed MCZ met with great approval by all sectors of stakeholders as it was felt that if restrictions were imposed on this area then all sectors would benefit and it would probably lead to an overspill of stocks.

### **Zone NG 2.20**

- Concern was voiced that if trawling was restricted, especially in proposed MCZs NG 2.20 and NG 2.21, vessels that normally worked in these areas would be forced to work in other areas putting more pressure on the grounds.

### **Zone NG 2.21**

- Concern was voiced that if trawling was restricted, especially in proposed MCZs NG 2.20 and NG 2.21, vessels that normally worked in these areas would be forced to work in other areas putting more pressure on the grounds.

**East of England Stakeholder Feedback (dMCZs, 2<sup>nd</sup> Iteration)**  
**Collated feedback presented via local Liaison Officer - January 2011**

**Zone NG 2.1**

- This area is heavily fished by vessels from the local ports.
- The majority of the inshore commercial fishing fleet are smaller vessels with smaller engines whose activities are limited by the weather and distance they can travel safely. Any restrictions to fishing activity in coastal areas could severely affect the inshore fishery.
- The commercial fishing fleet can confirm that sediments in the area are always shifting.
- The commercial fishing fleet are in support of the zone as long as their activities are allowed to continue. They are strongly against proposals to site a zone off the Suffolk coast if there are to be restrictions imposed on fishing activities.
- A number of commercial fishing vessels trawl off the Suffolk coast. Most of their activity is located within 3nm of the shore. Any restriction on their activities would directly impact upon them.
- Concerns about the damage to the sea bed from wind farm construction.
- Heavy mobile fishing gear could be potentially damaging to the habitat in the area and specific management may need to be considered.
- No undulate ray has been seen in this area for many years.
- The ports of Great Yarmouth and Lowestoft are located in this zone. They must maintain navigational channels through dredging activities. There is also a disposal site for excavated material in this area.
- A great deal of anchoring occurs within the area, up to and exceeding 12nm, particularly near Great Yarmouth and Lowestoft.
- The area is licensed for ship-to-ship transfer.
- Concerns about the affect of wind farms on the surrounding ecosystems.
- Concerns that activities associated with Sizewell B not necessarily compatible with conservation area (construction, vessel traffic, discharges etc).
- The Suffolk coastline is frequented by large numbers of sea anglers. Orford Ness is a particularly popular venue.
- Numerous charter vessels run trips for divers, sea anglers and wildlife enthusiasts.

**Zone NG 2.2**

- Commercial fishing fleet would be in support of the zone as long as their fishing activities (mainly potting and other static methods such as netting), can continue as normal in that area. The North Norfolk Coast is a very important potting ground.
- Concerns that the laying of cables might be damaging to species and habitats FOCI in the area.
- There is a no trawl zone already in place – the area already has some form of protection.
- Commercial fishing fleet have confirmed there are a variety of different sea-bed types in the area.
- The movements of fishing vessels in the area are restricted by weather and vessel size. Management measures selected will be crucial to the survival of fleet. Restrictions in inshore areas might cause displacement or prevent the smallest vessels from travelling

elsewhere to fish because their safety might be compromised and the cost of fuel would be prohibitive.

- Anglers frequent the North Norfolk coastline both for sea angling and bait collection.

### **Zone NG 2.3**

- The Wash is particularly important for shrimping. Restrictions to shrimping would impact negatively on the industry.
- The majority of the inshore commercial fishing fleet are smaller vessels with smaller engines whose activities are limited by the weather and distance they can travel safely. Any restrictions to fishing activity in coastal areas could severely affect the inshore fishery.
- Much of the commercial fleet's trawling activity occurs within 3nm of the shore.
- Concerns that the laying of cables might be damaging to species and habitats FOCI in the area.
- Heavy mobile fishing gear could be potentially damaging to the habitat in the area and specific management may need to be considered.
- Within this zone there are numerous spoil grounds, navigation channels and anchorages associated with ports of Boston and King's Lynn. In addition navigation channels are always changing and must be maintained through dredging activities.

### **General Comments for dMCZs in the East of England**

- Dredging areas off Lowestoft used to be ecologically diverse areas with productive fishing grounds. They would benefit from some protection and restoration.
- Cod spawning grounds near the Lemon Gas Field would be an ideal area for protection.
- Why not co-locate wind farms and Marine Conservation Zones?
- Mobile fishing gear types should be considered on an individual basis and not all included within one category.
- Many fishermen survive by switching between different methods and gear types at different times of year. They rely on having this flexibility. Restrictions on certain methods of fishing could threaten the survival of many vessels.
- Zones NG2.1, 2.2 and 2.3 together comprise a large proportion of the Norfolk and Suffolk coastlines (more so than in any other hub/region). The majority of activities occur along the coastal strip (sailing, watersports, diving, angling, fishing) – more consideration needs to be given to sea-users and their activities in this area.
- NG2.1, 2.2 and 2.3 surround small coastal communities, many of whose residents rely on fishing and the associated revenue to survive. Access to waters up to approximately 3nm offshore is critical for many vessels.
- Numerous charter vessels run trips for divers, sea anglers and wildlife enthusiasts along the Norfolk and Suffolk Coastlines.

## **Generic feedback provided by an NFFO representative, covering the NE Regional Hub area**

- The timeframe for the consultation process is too short; it needs to be extended by a couple of years
- It's difficult for professional fishermen to work themselves into the consultation process, as they are fully committed, working fishermen and usually do not have the time. Most other consultees are paid by their organisations and have the time and professional back up to be involved in the project.
- Question the need for so many obscure organisations to be involved in the process, as these are not directly involved in or affected by the potential outcomes.
- Unfortunately most fishermen do not realise what Net Gain is about and how it will affect them. This is not the fault of the Net Gain team, it's just the way fishermen are. Net Gain has distributed plenty of information on the project.
- The format of the Net Gain stakeholder consultation meetings is quite good. The charts/maps and the method of cross-referencing different compatibility matrices has been well thought out and is well suited to the job in hand.
- There is concern at the huge amount of sea area that is being designated at an early stage for different purposes, which are very obscure and vague. We have no idea what management measures may be taken in future, which may drastically alter peoples willingness to agree to these designations.
- Why does this all have to implemented at the same time? When the time comes, there are going tremendous problems when all this is launched at once. The MPA process should be a slow and gradual process over a few years, so it can be refined and altered as we learn more about how the system will work. Once set in place these designations are going to be virtually impossible to alter, whatever the consequences.
- The scientific evidence supporting different designations is very weak and inconclusive, and sometimes incorrect.
- When the project was initiated we were led to believe that only 8% of sea would be designated as one form of MPA or another. It looks like it will be more than 35% now, much more than is necessary or appropriate.
- This will cause tremendous problems in the form of potential displacement for many fishermen, and no thought is being to the painful consequences this will cause. This will be very counterproductive in terms of MPAs, as we will have areas of intense fishing activity and areas which are closed, producing no economic benefit to anyone.

## Meeting between Net Gain staff & the Environment Agency: 16/11/10

Those present: *<attendance to be confirmed>*

**NB - these are notes from plenary discussion and are designed to act as a supplementary record to proformas completed in the meeting.**

**Meeting delegates were divided into two groups – the following represent a summary of discussions within Groups 1 & 2**

- Different regional projects are looking at estuarine areas in different ways. With Balanced Seas, for example, they have proposed more intertidal Marine Conservation Zones, encompassing all of the estuaries. Sensitive management measures need to be developed in order to protect estuaries and prioritising them is difficult.
- Data availability /quality has led to different focuses and approaches.
- Species focus can lead to a lack of consideration of habitats.
- Lots of data is available on the Humber Estuary – care should be taken to ensure that this estuary is receiving the maximum level of protection.
- There are issues with the quality of data on highly mobile species, particularly smelt. It is noted that data has been provided to the Net Gain team on the habits of smelt and that their movement is limited to estuaries. They would not be covering as large an area as currently shown; they would only stray out of estuaries into areas of low salinity.
- Smelt cannot move between estuaries and generally do not go out of estuary mouths.
- Smelt data is comprehensive and has a high confidence associated with it - this data has been provided to Net Gain by the EA (action – Net Gain to check the status of this data).
- There is more subtlety required in the data and on the protection levels for highly mobile species than is currently shown.
- New legislation is coming into effect around the exploitation of the European eel.
- Saltmarsh, and particularly intertidal areas, need to be protected. Saltmarshes, mudflats and high intertidal areas are extremely prolific and important areas for a range of reasons.
- Intertidal areas in the North East are incredibly important (even small ones) - they are not currently protected and productivity in these areas is very high.
- Estuarine areas could help with the connectivity principle of the ENG.
- Flood and Coastline Risk Management has a duty to support and further Marine Conservation Zones and any other Marine Conservation initiatives. FCRM should take note of any of their activities that may potentially impact on the progress of the Marine Conservation Zones Project.
- As sea levels rise, high value intertidal areas will develop, some habitats are being created already.
- Action – Net Gain to answer question on how far inland the intertidal areas that are currently being proposed will go.
- IFCAs will be responsible for the intertidal areas, this has been confirmed by DEFRA.
- Group would like it noted that the tentacled lagoon worm is also present in the Wash.

- Sea trout populations are present in Lincolnshire and The Wash and are not currently listed – Action - check all of the EA reports that have been sent to the Net Gain GIS team to date.
- River Basin Management Plans apply out to 1 nautical mile.
- Solid answer is required on the issue of co-location of wind farms and Marine Conservation Zones – does the underlying concern lie around the cable sheathing that is used in any particular wind farm site?
- Licensing measures are in place affecting the deployment of equipment such as wave buoys; Action – Net Gain to check any existing guidance on this issue.
- Existing monitored sites could be reference sites as they have good existing evidence and monitoring systems in place. Tie-in with these existing measures is a possibility.
- Question to Net Gain - have existing Seafisheries Committee byelaws been looked at during the Net Gain process? Answer given that, yes, existing byelaws have been incorporated into discussions at hub meetings. Feedback received that this is a good thing as there could be good potential link up with location and management.
- Estuaries of Tyne, Tees, Wear and Tweed incorporate fish populations within important nursery areas; extending the boundary of sites in the North East to incorporate these could be beneficial.
- Estuaries have become massively important sites for sea angling, which has a massive economic benefit for coastal communities.
- Estuaries are particularly important for biodiversity.
- Question for Net Gain team - who will be responsible for the monitoring that will be necessary in reference areas?

Action – Net Gain to check meeting dates for February to enable a follow-up meeting to be scheduled as soon as possible.

### **Summary of discussions within Groups 3 & 4**

- Workshop members felt they could only discuss the inshore dMCZs and BAIs (i.e. those that fall within the Environment Agency’s area of jurisdiction).

Issues that need to be considered with regard to the Environment Agency include the following:

- The EA is responsible for beach replenishment and sources its materials from offshore aggregate extraction sites. Therefore impacts on aggregate operations would affect EA’s beach nourishment schemes across the whole of the Net Gain area.
- Bathing waters.
- Shellfish waters in the Wash.
- Areas with sea defences versus areas without sea defences.
- Sewage outfalls and coastal discharge – fluvial outfalls in long tunnels stretching out into the sea, which need maintenance.
- EA obligations to water quality and the Water Framework Directive.
- Features directly linked to management operations: eel and smelt - require management at tidal limit (with regard to barriers to migration etc). Implications for mobile species and nursery grounds for fish in estuaries.

Comments made:

- Agency would need clear guidance with regard to its internal processes and operations.
- Agency is pro the coincident designation of European Marine Sites and Marine Conservation Zones (i.e. multiple designation within the same area).
- Coastal change is occurring constantly - MCZ boundaries will need to change over time to reflect this.
- Concerns with consistency in process across different types of MPA, across the four Regional MCZ projects and between all the bodies involved (NE, JNCC, MMO etc). Would like to see a more uniform process rolled out across the GOs.
- Balanced Seas/Net Gain overlap needs to be examined further.
- There is generally more confidence in the ecological data for NG2.3. There is the implication that sites may be selected where underlying data is more reliable, whereas sites that we know less about (e.g. offshore) may be ignored.
- Clarification is needed regarding the exact location of HWM or saline-freshwater boundary for management purposes.

Questions for Net Gain:

- How will the MCZ process interact with the Marine Strategy Framework Directive?
- How will the MCZ process interact with the Water Framework Directive?
- Is there a review process? 6 years.
- How far will MCZs extend into estuaries? How will this be measured? The HWM/saline-freshwater boundary is constantly moving.



**Précis of feedback following collation of outputs from the 4<sup>th</sup> round of Regional Hub meetings (January 2011) and/or the release of the 3<sup>rd</sup> Iteration report to the SAP**

Feedback from national organisations represented on one or more Regional Hubs:

- British Marine Aggregate Producers Association
- RSPB
- Scottish Power Renewables
- Environment Agency
- The Crown Estate
- The Wildlife Trusts

Feedback from individual Regional Hub members:

- Bob Coates (Flamborough fisherman – YH Hub member)
- Les Weller (Recreational Sea Angling - NE Hub member)

Feedback following Liaison Officer meetings with fishermen from:

- Lowestoft (c.9 local representatives)
- Orford, Aldeburgh & Felixstowe Ferry (c.14 local representatives)
- North Norfolk (c.25 local representatives)
- Aldeburgh (4 local representatives)
- Wells (7 local representatives)
- Withernsea (1 local representative)
- Grimsby (3 local representatives)
- Kings Lynn (10 local representatives)
- Boston (3 local representatives)
- Yorkshire & Humber regional Hub – collated from several local meetings
- North East Regional Hub – collated from several local meetings

Feedback from other interested parties:

- New Orford Town Trust



### Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: Mark Russell (Director, BMAPA) .....

Sector represented: Marine aggregates .....

Regional Hub: Yorkshire, Lincolnshire, East of England.....

Please explain briefly how the feedback you are presenting was collected:

A combination of meetings, telephone conversations and email exchanges with member companies .....

.....

.....

Please indicate how many people you have been able to discuss this feedback with: Representatives of the eight marine aggregate operators who have interests in the Net Gain region (Hanson Aggregates Marine, CEMEX UK Marine, Tarmac Marine Dredging, Volker Dredging, Westminster Gravels, Van Oord, DEME Building Materials & Sea Aggregates).....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

It would be helpful if the shape files for the current site boundaries (as modified through the recent series of Hub meetings) could be made available as soon as possible.

The comments below relating to the third iteration report have been amended with further comments (in italics) in response to discussions and site amendments at the recent series of Hub meetings. The boundary changes made at these meetings have gone a considerable way to addressing concerns of the sector, by increase the distance between marine aggregate interests and proposed MCZ sites, thus further buffering against any potential impact arising from indirect plume effects. The understanding of both the project team and other Hub members in helping to agree to these amendments is appreciated.

Because the broad scale habitats being protected by the sites that lie closest to marine aggregate sites tend to be dynamic with a degree of natural sediment mobility associated with them (as evidenced from survey data presented in the Marine ALSF REC studies), we suspect that the distance between all sites being currently proposed and marine aggregate interests, particularly those tide parallel to sites, is probably sufficient to ensure that any indirect effects that result from marine aggregate operations will be insignificant in the context of the conservation objectives of the site.

If this interpretation is verified then we would be able to modify our level of support to a more positive position. We would add that we have consistently called for enhanced guidance to assist and inform the judgement calls required during this process in order to provide clarity and confidence to everyone contributing to the process, but equally recognise that this is outside of the project teams control. However, until the vulnerability and risk assessment process for our sectors activities is completed and verified by the SNCB's, we unfortunately have no option but to retain a holding objection position.

Site ID	<b>Level of support for site, <u>score</u> from 1 to 4:</b> 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	<b>Suggested adjustments to improve conservation benefits, reduce impact or improve potential management</b>	<b>Expected impacts for your sector if current activities are restricted</b>	<b>Any other comments</b>
---------	---	--	--	---------------------------

<p>NG 9</p>	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>We note that the boundaries of the original sites NG2.9/2.10/2.13 (Iteration 2) have been further amended to remove any direct interaction with marine aggregate interests. The location of these interests relative to the refined site boundaries (to the south, along the tidal axis) means that there are still residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG9 should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Subject to clarification over the sensitivity &amp; significance of these pressures, the definition of potential MCZ site boundaries should be considering minimum buffer distances between existing known activities/operations to mitigate against the potential of indirect effects.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km<sup>2</sup> to the south (Areas 102 &amp; 105).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests if significant effects are predicted.</p>
-----------------	--	--	---	---

NG 8	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>The site lies approximately 1nm cross tide to the nearest marine aggregate interests further to the east. Consequently based on knowledge and evidence of impacts, the residual concerns over the implications of potential indirect plume impacts arising from extraction operations are far more limited – albeit this requires confirmation.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG8 should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km2.</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests if significant effects are predicted.</p>
---------	--	---	---	---

<p>NG 6</p>	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>We note that the boundaries of the original sites NG2.9 (Iteration 2) have been refined, and that these amended limits now correspond more directly to Area 480, and active marine aggregate production licence. The boundaries also lie immediately adjacent to Areas 106 and 105.</p> <p>The implications for Area 480 – whether within or immediately adjacent – need to be clarified. The location of this interest, relative to the refined site boundaries (to the immediate west), means that there are considerable concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG6 should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Subject to clarification over the sensitivity &amp; significance of these pressures, the definition of potential MCZ site boundaries should be considering minimum buffer distances between existing known activities/operations to mitigate against the potential of indirect effects.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Area 480 has the potential to result in both direct and indirect impacts on the proposed site, while Area’s 106 &amp; 105 could result in indirect effects.</p> <p>In all cases, if these impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km2.</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests.</p> <p><i>NB – Following the Lincolnshire Hub meeting on 25.03.11, the boundaries of this site were amended. In particular, the south eastern boundary was redrawn from the northern limit of Area 480, extending down to the south east. This increases the distance between the revised site and the aggregate interests to the west, which in turn should reduce the risk of indirect effects. Overall this has gone a considerable way to addressing our concerns.</i></p> <p><i>Further information will be provided on the status of the Sabellaria feature to the east of Area 480 at the next Hub meeting.</i></p>
-----------------	--	---	--	---

<p>NG 5</p>	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>The site lies approximately 3nm cross tide to the nearest marine aggregate interests further to the east. Consequently based on knowledge and evidence of impacts, the residual concerns over the implications of potential indirect plume impacts arising from extraction operations are far more limited – albeit this requires confirmation.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG5 should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £6.4m/km<sup>2</sup> (Area’s 197 and 493, with areas 400 and 439 more distant still).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests if significant effects are predicted.</p>
-----------------	--	---	--	---

<p>NG 4</p>	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>We note that the boundaries of the original sites NG2.05/2.06 (Iteration 2) have been further amended to remove any direct interaction with marine aggregate interests. The location of these interests relative to the refined site boundaries (to the west and immediately to the north) means that there are still residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG4 should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Subject to clarification over the sensitivity &amp; significance of these pressures, the definition of potential MCZ site boundaries should be considering minimum buffer distances between existing known activities/operations to mitigate against the potential of indirect effects.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £6.4m/km<sup>2</sup> to the north (Area 440) and £8.675m/km<sup>2</sup> to the south (Areas 107 &amp; 481).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests.</p> <p><i>NB – Following the Lincolnshire Hub meeting on 25.03.11, the boundaries of this site were amended. In particular, the northern boundary was shifted 1000m southwards away from Area 440 – this considerably increases the distance to the aggregate interests in the north which in turn should reduce any risks associated with indirect effects. Overall this has gone a considerable way to addressing our concerns.</i></p>
-----------------	--	--	--	--



<p>NG 1b</p>	<p>Currently 2 (but could be 3 if status of indirect issues are clarified)</p>	<p>We note that the boundaries of the original site NG2.01 (Iteration 2) have been amended. While we recognise that these still exclude existing and proposed marine aggregate interests, the modified boundaries now appear to fall closer to some of these sites – particularly to the south, but there are also interests to the north. In both cases these are located along the tidal axis from the MCZ, consequently there are residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>The spatial extent of indirect impact footprints can be mitigated by minimising the area dredged at any one time in line with Government policy (MMG1), and the mixed sediment habitats comprising NG1b should be relatively tolerant of the limited changes in natural turbidity and sediment transport that are likely to result – given the area is relatively mobile anyhow.</p> <p>Subject to clarification over the sensitivity &amp; significance of these pressures, the definition of potential MCZ site boundaries should be considering minimum buffer distances between existing known activities/operations to mitigate against the potential of indirect effects.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a score of 2. However, the site opinion could shift to a more positive position if clarifications are provided.</p>	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £10.85m/km<sup>2</sup> to the north (Area 496) and £3.4m/km<sup>2</sup> to the south (Area 507/2, 507/5 &amp; 498).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The potential for activities to have indirect effects on features within MCZ site proposals, and therefore the potential need to consider minimum buffer zones between existing activities and potential sites is not addressed in the ENG.</p> <p>Although aggregate interests lie outside the proposed dMCZ boundary, it is important that the methodologies/approaches for determining significance of potential indirect effects are established – as was stated in our response to the second iteration.</p> <p>Given the broadscale nature of the majority of habitat types being protected, if indirect effects are considered to be significant, dMCZ boundaries should be modified to account for minimum buffer distances with existing marine aggregate interests.</p> <p><i>NB – Following the Lowestoft Hub meeting on 30.03.11, the boundaries of this site were amended. The northern section was redefined based on a cable corridor – this considerably increases the distance to the aggregate interests in the north, reducing the risks of indirect effects. To the south, further amends were made based on the exclusion of the south western corner (another cable corridor) and agreement was reached for the southern boundary to be moved 500m further north to again reduce the risks of indirect effects. Overall this has gone a considerable way to addressing our concerns.</i></p>
------------------	--	---	--	---


When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



## Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: **Helen Quayle**.....

Sector represented: **RSPB** .....

Regional Hub: **On behalf of all RSPB regional hub representatives** .....

Please explain briefly how the feedback you are presenting was collected:

**Internally within the RSPB; all 4 hub reps, Marine Conservation Officer and coastal reserve staff and externally with other conservation NGOs**

Please indicate how many people you have been able to discuss this feedback with: **10+** .....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

.....  
.....

### General feedback on the 3<sup>rd</sup> iteration submission

- dMCZs have largely been selected on basis of socio-economic impacts rather than their ecological value. Selection on this basis is unlikely to provide an ecologically coherent network. Greater precedence should be given to the criteria relating to Areas of Additional Ecological Importance (AAEI) in the ENG.
- There has been limited availability/use of ecological datasets at the regional hub meetings, partly due to their limited availability before the October hub meetings. As a result there is little overlap between AAEI and the dMCZs. As a result, we are concerned that implementation of the current network of MCZs will end up displacing damaging activities from these protected areas into important biodiversity areas.
- There are no dMCZs proposed in the following biodiverse areas: Durham Coast/Tees Bay, the Flamborough-Helgoland front, Flamborough Head, Norfolk coast (Little Tern colony at North Denes, Yarmouth) and the western North Norfolk Coast.
- The 3<sup>rd</sup> iteration was largely driven by the need to cut back the 'surplus' BSH areas (e.g. subtidal sand), making it very difficult to look at the bigger picture such as new areas, or the previous round's BAIs.
- Going forward, it seems likely that there will be further pressure to remove 'surplus' BSH areas. Given the limited overlap of dMCZ and AAEI, it is critical that reductions in BSH should be sought in areas of comparatively low biodiversity, rather than in biodiverse areas. When similar sites are being considered those with the highest number of AAEI should be maintained: we recommend that Net Gain produce a biodiversity 'league table' establishing the comparative importance of dMCZs to achieve this.
- There is continued lack of clarity regarding whether non-BSH/FOCI features can be interest features of MCZs (and therefore have conservation objectives/management measures set for them). Until this issue is resolved, AAEI features should be considered as potential MCZ features.
- It is unclear how the Pelagic Ecological Importance scores in the Additional features tables have been calculated. Clarity regarding this before the next hub meetings would be much appreciated, as there appear to be several anomalies. An example (NG14) is given in the table below.
- We are concerned that if AEIs can't have conservation objectives and management measures set for them, there will not be a process to secure the protection of these AEI features. In the absence of this protection, we question whether the requirement for the delivery of an ecologically coherent network of MCZs can be met.
- Limited engagement of the ports sector with the regional hub process has meant that MCZs within certain estuaries have not been pursued. Estuaries are important breeding and spawning grounds that underpin many aspects of marine biodiversity, including certain fish stocks. Again we are concerned that ecological coherence will not be reached.

Site ID	Level of support for site, <u>score from 1 to 4</u> : 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
NG1	4 – for original site	<p>Reducing the size of this site diminishes the ecological value and viability. This goes against SAP advice to avoid reducing the size of sites that deliver significant ecological benefits while larger sites with less ecological value remain.</p> <p>One BSH and six FOCI habitats listed for NG1 are lost with the splitting of this site (table 6.1a, Net Gain 3<sup>rd</sup> Iteration Final Report). Subtidal sand and mud have been reduced from 75.66 and 39.09 in NG1 to a maximum of 5.54 and 4.31 respectively in the small replacement sites. Sites NG1a to NG1d therefore <i>are not necessarily ecologically equivalent to NG1</i>.</p>		<p>At the last round of hubs the opportunity to discuss the merits of an MCZ in the coastal strip running further north to Great Yarmouth and the important little tern colony at North Denes seemed to have been lost. This was part of NG1 for the majority of the previous hub session. This site was reduced at the last moment without consensus from the RSPB hub rep. RSPB did not agree to lose the northern portion of the dMCZ as well as the offshore section.</p> <p>RSPB is concerned that NG1 was dropped in preference to the NG1a to 1d group of sites, which were in turn largely cut following discussions at the one day meeting in March. The RSPB supports the view presented in the Wildlife Trusts feedback following the 3<sup>rd</sup> iteration submission to SAP, that site NG1 should be retained in its entirety for the mosaic of broad-scale habitats, and its overlap with part of the Outer Thames SPA, an area of considerable pelagic ecological importance.</p> <p>It would have been useful to have seen the advice from the SAP on these options before the group discussed which areas to keep, lose or modify.</p>

NG1a	Neither support or against			
NG1b	2- Against this site being selected in preference to the original NG1 or other NG1 replacement options support or against. but support (4) in the absence of NG1	<p>There is potential to extend this site to join up with NG1c or select the coastal options in preference to this site.</p> <p>Do not make the cuts for cable routes proposed at the March meeting.</p>		<p>This offshore site does not have the same conservation and ecological benefits as the coastal strip site as it is potentially out of the foraging range of coastal seabird colonies. Given the loss of site NG1, we support the retention of this site as an MCZ, but do not support the decision taking by the group majority that this site should be cut back to allow for offshore wind farm cable routes. Such routes would need to meet more stringent European site protection requirements.</p> <p>Further cutting of this site which has already been drastically reduced will further diminish its ecological value and contribution to a network of marine protected areas.</p>
NG1c	4 – Favoured option of the NG1 replacements, would be more supportive of the original site being reinstated.	<p>Restrictions/reductions in benthic trawling activity.</p> <p>All features present including AEI where appropriate should be designated features.</p>		<p>The RSPB strongly supports the retention of this site as an MCZ particularly now after the March meetings this is the only site left on the south eastern coast, however as outlined above we would prefer the retention of whole of NG1 area.</p> <p>Of the four proposed sections of NG1, NG1c holds the highest number of BSH and habitat FOCI. The taxonomic distinctiveness of NG1 was top 5% within Net Gain. None of the proposed replacements NG1a-1d match this. NG1c is the closest with a taxonomic distinctiveness of top 25% within Net Gain. This is also the only one of the replacement sites recorded as having above national average biotope richness and top 5% with Net Gain biotope distinctiveness.</p>

NG1d	3	This site could have been extended to join up with NG1c and NG1d but was dropped as part of the one day meeting discussions in March.		Loss of this site took place before feedback from the SAP was released.
NG2	4	<p>The boundary should be revisited with the loss of the dMCZ as NG2.03. This was requested in the hub by both the MCS and RSPB.</p> <p>The area to the west is of greater importance for pelagic productivity and seabirds. The site should be extended in this direction to encompass these areas of greater ecological value.</p>		RSPB support this site.
NG2.3	4			RSPB is disappointed that this site was dropped as an MCZ due to the existing MPA, and that there wasn't time to discuss the additional information provided in the biodiversity report due to time constraints. Opportunities to protect other important local features were not fully explored, including important bird colonies. The Outer Trial Bank has a colony of lesser black backed gulls, herring gulls and black-headed gulls, and nationally important numbers of scoter and eider are also present in the area in the winter. Nationally important numbers of Fulmar breed on cliffs at Hunstanton and Weybourne.

NG5	3	<p>We would like to see the inclusion of little terns as an feature of AEI in this MCZ. These threatened seabirds usually forage a maximum of 11km from their breeding grounds, and this site encompasses likely foraging areas from important colonies.</p>		<p>RSPB support the retention of the existing northern boundary in the Humber Estuary, adjoining the boundary of NG8.</p>
NG8	3	<p>We would like to see the inclusion of little terns as an feature of AEI in this MCZ. These threatened seabirds usually forage a maximum of 11km from their breeding grounds, and this site encompasses likely foraging areas from important colonies.</p> <p>We support the continued protection of the no trawl zone in this MCZ.</p>		
NG9	4 – If extended northwards and BSH retained	<p>This site would have greater ecological benefit if it were extended further northwards into the Flamborough-Helgoland frontal system. Subtidal sand and mixed sediments to be included as BSH features.</p>		<p>Clarity is needed on the features of AEI that fall within this MCZ and should be considered as potential interest features of it. The additional comments for this site at the end of the hub report suggest that this site encompasses wintering bird hotspots. In addition, the seabird FR/AEI maps indicate that this site is also of great importance for breeding and summer seabirds which should be captured.</p>



NG10	4 – if a seaward extension of the site were included in the MCZ	We welcome the commitment to look at a seaward extension of this site, as this would be likely to encompass an area of high AEI. The RSPB would be pleased to propose a site boundary based on the seabird foraging radii data layer. As noted in the 3 <sup>rd</sup> iteration report, the Filey coastline supports approximately 11,500 pairs of breeding seabirds, indicating that offshore waters in the vicinity have high productivity.	<p>Fishing activities in Filey Bay are currently restricted under a byelaw.</p> <p>Many of the seabirds foraging here travel from Flamborough Head including RSPB reserve Bempton Cliffs.</p> <p>A decline in the seabird population at Bempton Cliffs could result in reduced visitor numbers which would affect both RSPB and the local economy. Several local businesses are geared to take advantage of visitors to the reserve including B&amp;Bs, caterers and seabird cruises <sup>1</sup>. One B&amp;B stated that 70% of its visitors were bird watchers. The final report concluded that in 2009 an estimated income of over three quarters of a million pounds coming into the local area was attributable directly to seabirds. This income supports over 5% of all employed people in the Bempton Parish Council area not including the 11 staff employed at the reserve.</p>	
NG11	3			The coastline between Saltburn and Whitby supports significant numbers of breeding seabirds, particularly kittiwake. This is probably reflected in the reasonably high densities of seabird during the breeding season and summer periods found in the ESAS dataset. Designation of an MCZ in this area could bring additional ecological benefits by providing improved foraging habitat in the vicinity of the colony.

NG13	4	<p>We believe designation of this area as an MCZ will deliver significant conservation benefits.</p> <p>Nevertheless, we are somewhat concerned that the lack of engagement with the North East regional hubs by the ports industry has prevented a proper discussion on the merits of designating the Blyth, Wansbeck and Seaton Burn estuaries as part of this MCZ. The RSPB believes there is a strong case to designate these estuaries (or parts of them) to protect fish spawning grounds and note that there was high support in the last regional hub meeting for designation of estuaries as MCZs.</p>	<p>We do not believe that the MCZ designation will affect the RSPB's management of the Coquet Island Special Protection Area and Site of Special Scientific Interest. Indeed protection of the seabed habitat and associated species is likely to deliver benefits for the SPA/SSSI interest features through improved foraging opportunities.</p>	<p>Re p96 of the 3<sup>rd</sup> Iteration Report – the most important bird foraging areas are in the north rather than south of the site (ie around Coquet Island)</p>
NG13a	3			<p>We support the designation of the AIn Estuary, and wish to see further estuaries designated as MCZs to protect fish spawning grounds (which in turn support pelagic biodiversity).</p>

<p>NG.14</p>	<p>4</p>	<p>Whilst we are pleased that the site has been extended southwards to include an area of high pelagic biodiversity, the significant reduction in the size of this site is of high concern as it was identified as the most biodiverse site of those selected by the regional hub at the October meeting.</p> <p>We support the idea of protecting the southern part of the site for its pelagic importance. However, if the SAP takes the view that this approach is not appropriate, we believe that the NG14.S should be treated in the same way as NG14.N, with the whole area designated for Broad Scale Habitats and any habitat or species FOCI present.</p>	<p>This MCZ lies within the foraging range of a number of the Farne Island SPA's features, including puffin and guillemot. The area is also of importance for wintering seabirds. Protecting this area is likely to support the conservation of the Farne Islands, and in turn maintain the important visitor economy at Seahouses.</p>	<p>We support the comments regarding the potential need for a reference area for subtidal mud between the Tyne and the Tees.</p> <p>This site was briefly revisited at the March MMO meetings, and the possibility of reducing the site explored. As set out in our general feedback, given the limited current overlap between AA EI and MCZs, particularly relating to pelagic biodiversity, we believe further reductions in the size of areas of BSH should be targeted at the MCZs across the Net Gain region that have the lowest AA EI value. This should be quantified in advance of the next hub meetings by producing a 'league table' that identifies which sites are of least value and therefore can be reduced without impacting on the ecological coherence of the network.</p> <p>Bearing this in mind, clarity is urgently needed regarding how the pelagic importance scoring has been carried out for this and other sites. Regarding the 'Overall Importance Score', NG14N is scored 2 (despite 3-10 being the range according to the table), and RA NE3 scores 9, despite RA NE3 falling within NG14N. From the JNCC/Wildlife Trust data layers shown at the regional hub meeting, NG14S appeared to be an area of very high pelagic biodiversity, so we question whether the scoring is correct in this – and potentially other - dMCZ. <u>It is essential that these scores are properly calculated so the comparative exercise referred to above can be carried out.</u></p>
--------------	----------	---	---	--

Other estuaries in the North East regional hub area				See comments above regarding estuaries in the vicinity of NG13. We also believe that the potential for MCZs within other North East estuaries (Tyne, Wear, Tees) has not been adequately considered and hope that future regional hub meetings will be given an opportunity to do this.
Other potential MCZs in the North East regional hub area.				<p>The RSPB is concerned that no MCZs have been brought forward between the Tyne and the Tees, primarily due to time constraints, and remains of the view that further MCZs should be brought forward in the following locations:</p> <p>Durham Heritage Coast (site 7 in the 'Biodiverse Areas' document)</p> <p>Tees Bay (site 8 in the 'Biodiverse Areas' document)</p> <p>We hope these areas can be properly considered in subsequent hub meetings.</p>

<sup>1</sup> **RSPB (2010).** *The Local Value of Seabirds: Estimating spending by visitors to RSPB coastal reserves and associated economic impact attributable to seabirds.* The RSPB, Sandy, UK.

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG

Friday, 01 April 2011

Dear Steve Barnard,

Please find below our feedback on the 3<sup>rd</sup> progress report produced by NetGain project team.

**General Comment:**

EAOW are supportive of the revised boundaries as discussed and agreed during the East of England regional hub meeting on the 30<sup>th</sup> March 2011 in the Orbis Centre, Lowestoft. It is our understanding that these sites fulfil the ENG criteria and are not co-located with EAOW development zone or revised cable route sent to NetGain on the 28<sup>th</sup> March 2011.

Please find below some general comments on the 3<sup>rd</sup> iteration report.

**General: Section 4**

- Bullet point 1 - It is unclear what habitats (and subsequent area) that fall within SPA boundaries are protected by the MCZ process. For example within the Outer Thames Estuary SPA, but out with the dMCZs, are any habitats protected through the MCZ process? Initially a gap analysis was carried out to differentiate the habitats that were deemed to support the qualifying feature (wintering red throated diver) and therefore afforded protection through the SPA process. It would be helpful if a figure was provided that shows all areas that fall within the existing MPAs and the new dMCZs.
- Bullet point 3 - Within Figure 4.1 it is unclear within the Haisborough, Hammond and Winterton SAC (and Inner Dowsing, Race Bank and North Ridge SAC) the extent of Annex I habitats that are afforded protected through the Natura 2000 process and which areas have been included as part of the gap analysis and go towards meeting the MCZ targets. This could cause confusion on what area and features are protected through the MCZ process and the associated conservation objectives and management measures.
- We strongly suggest that the group's final report is circulated to the hub members for review prior to final submission.

**Specific comments regarding Section 6: Site NG1.a, b & c**

- Pg 33: There is some confusion about what sites are being referred to in the report in section 6, for example: NG1.b is referred to as subtidal mud however it appears to be subtidal mixed sediment within figure 6.1
- Pg 33: NG1.b is almost entirely located within the East Anglia ONE cable corridor and therefore reference to the 'southern' portion is misleading. We query how sensitive subtidal mixed sediment are to cabling and we continue to be disappointed that further clarity on what management measures are required for this BSH has not been provided to the project team. *Note this topic has been superseded by the revised cable corridor supplied by EAOW*
- Pg 35: We disagree with the comment 'Site NG1a was put forward for the subtidal mud broad-scale habitat (to replace the area of subtidal mud that would be lost from the original site NG2.01, should this inshore site not go forward. This new site would be coincident with part of the Haisborough, Hammond and Winterton SAC. Whilst data quality and confidence issues are noted at site 1a, Natural England noted that this site would have relatively low contention as there is no windfarm activity' as this site is co-located within East Anglia development zone and this should be amended. *Note this point has been superseded by the revised site boundaries as agreed by the EoE regional hub on the 30/03/11*

Yours sincerely,

Marcus Cross  
Environment Manager

**Minutes of the Meeting with the Environment Agency to Discuss Outputs of the 3<sup>rd</sup> Iteration  
10am at the Environment Agency Brampton Office on 11/03/2011**

**Present:** Dani Sewell (NG), Dan Davies (NG), Tammy Stamford (NG), Katie Critchley (EA) and several other members of the EA (please see Agenda included page 3).

**Zones NG 1, NG 1b, NG 1c, NG 1d**

- Alde and Ore estuary water bodies at high risk of not achieving good ecological status (particularly with reference to dissolved organic nitrogen). MCZ designation might indirectly help to achieve this. Blythe estuary also non-compliant.
- Orford Ness very popular angling destination.
- EA looking offshore (NG1b) for future sources of material for beach replenishment.
- Significant populations of smelt in the Alde and Ore – EA has good data that it can provide Net Gain with. Data for sprat, herring, sand smelt, smelt, sole, dab, bass European eel.
- Used to be a smelt fishery along the Waveney.
- Uncertain about the accuracy of Net Gain's smelt data. Smelt are known to travel only a short distance from the estuaries.
- Suggestion to extend northern boundary of NG1 to the north of the River Blythe to capture the estuary in its entirety.
- Possess saltmarsh data for the Anglian region which could be shared with Net Gain.
- Blythe estuary is an N2K designation – NE collecting data for this area.
- Water framework directive data sparse for the Alde, Ore and Blythe.
- Seems sensible to keep NG1 as contiguous area incorporating all the estuaries.
- Feel additional protection would be beneficial in estuaries – existing management not sufficient.
- ***Which round is the Triton Knoll wind farm?***

**NG 2**

- NG2 sits within the Norfolk East Coast Water Body. Some dredging activity does occur here but there are already mitigation measures in place (e.g. site selection to avoid the more sensitive areas, managing the disturbance etc).

**NG 4**

- Lots of data for the Wash but this reflects sampling effort – approximately 25 sample sites for the Wash.
- Not so much information for NG4.
- Sediment management practices fall within NG4 (as in NG2).

## NG 5

- Beach replenishment Mablethorpe to Skegness.
- ***Saltmarsh present along the coast by NG 5. Why not included within the site as a designated feature? Why is the boundary drawn outside it?***

## NG 6

- Too far offshore – can not comment.

## NG 7

- Too far offshore – can not comment.

## NG 8

- Importance of Humber for smelt and nursery areas.
- ***How will reference areas be selected for highly mobile species?***

## General comments

- Implications for issuing consents – MCZ processes to tie in with existing processes for N2K appropriate assessment? What are the implications for EA processes?
- Support for estuarine protection. Features not already covered with existing protection would benefit. Particularly beneficial for mobile species. EA happy to provide data, particularly for estuaries to support designation for highly mobile species. Katie to speak to CP.
- EA have Shoreline Reinforcement/Structures dataset that could be provided to us. Provides an assessment of threats to estuaries and information on fisheries and the state of the water bodies.
- New IFCA members may need an update. DS assures that this has happened this week.
- ***Ok to circulate FTP password within EA?***

**Marine Conservation Zones feedback workshop**  
Conference Room, Brampton office, nr Huntingdon  
11 March 2011  
10:30 -15:00

**Key aims:**

- To provide NetGain (the North Sea MCZ project team) with feedback on the third iteration draft Marine Conservation Zones that have recently been submitted to Defra
  - Are there any Environment Agency activities happening in these areas at present?
  - How could these draft MCZs affect the Environment Agency's regulatory and/or operational responsibilities?
  - Future recommendations for these sites (conservation objectives and management measures)

**Agenda:**

Time	
10:00	Refreshments available in Conference room
10:30	Welcome and intros
10:45	NetGain presentation (updates, progress made since last meeting etc)
11:00	Workshop session
12:30	Lunch?
13:30	Resume discussions
14:30	Summing up/questions
15:00	End

**Attendees:**

**NetGain:** Dan Davies, Dani Sewell, Tammy Stamford

**EA:** Mark Andrews, *Chris Ashcroft, Mike Best, Steve Colclough, Katie Critchley, Amanda Elliott, Dave Freeman, Dave Gallagher, Helgi Gudmundsson, Roger Handford, Ian Hirst, Emma Love, Sarah Peaty, Will Riggs, Toni Scarr, Victoria Slingsby, Karen Thomas, Nigel Tomlinson, Don Westman*

*Italics* = TBC





## Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: Andrew Finlay .....

Sector represented: The Crown Estate, Landowner .....

Regional Hub: All .....

Please explain briefly how the feedback you are presenting was collected:

By conducting a conflict check of proposed MCZs with MaRS .....

Site ID	Level of support for site, <u>score from 1 to 4</u> : 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
MCZs not mentioned below are supported by The Crown Estate				
1	2 - until we know management measures won't restrict activities	Overlays coastal section of Round 3 Zone 5 Cable route Overlays many international telecommunication cables Overlays aggregate high value resource worth £3.4m per km2. Borders 'Cutline' Aggregate Option License	Impact on Nationally Significant Infrastructure Project, international telecommunications and Aggregate Industry.	
1b	1 - until we know management measures won't restrict activities	Overlays majority of Round 3 Zone 5 Cable route	Impact on Nationally Significant Infrastructure Project	

1c	2 - until we know management measures won't restrict activities	Overlays part of coastal section of Round 3 Zone 5 Cable route	Impact on Nationally Significant Infrastructure Project	
1d	2 – until we know management measures won't restrict activities	Within Round 3 Zone 5 Zone Development Area	Impact on Nationally Significant Infrastructure Project	
RAL W3	2	Suggest move it another 1.5km west to avoid restriction to cabling and Sheringham Shoal	Concerns that only a 500m buffer may restrict maintenance and repair works to cables	
RAL W2	2	Suggest move it 2km from wind farm projects to avoid restriction to construction and operation of Docking Shoal and Race Bank	Currently only 500m distance between reference area and both wind farms which may restrict projects	
4	2	Overlays Sheringham Shoal and Race Bank Wind Farm projects. Borders Aggregate Production License Suggest remove eastern half of NG.4 to avoid co-location with Sheringham Shoal	Impact on Nationally Significant Infrastructure Project	We are surprised to see the eastern half of this area remaining in the 3 <sup>rd</sup> Iteration. The Crown Estate's understanding after stakeholder discussion at the StAP and Lincolnshire and Wash Hub meeting was that the half would be removed as ENG targets had been exceeded.
5 and 8	2 – until we know management measures won't restrict activities	Overlays Round 3 Zone 4 cable corridor Overlays Round 3 Zone 3 cable corridor Overlays international telecommunications cables and renewable power cables	Impact on Nationally Significant Infrastructure Project and cables	
6	2 – until we know management measures won't restrict activities	Currently overlays Humber Estuary 106 Aggregate Production Licence  Potential impact on Triton Knoll operation and cable routes	Restriction of aggregates industry	
7	2	Overlays part of Round 3 Zone 4 Development Area Suggest remove as ENG targets exceed unless connectivity target requires this area	Impact on Nationally Significant Infrastructure Project	
8	2 – until we know management measures won't restrict activities	Overlays Round Zone 3 Tranche 1 Cable Corridor Route  Overlays Round Zone 4 Project 1 Cable Corridor Route	Impact on Nationally Significant Infrastructure Project and cables	

9	1	<p>Overlays part of Round 3 Zone 4 Development Area</p> <p>Buffer zone of only 500m will still likely have implications Westernmost Rough Project – see DONG letter to Netgain</p> <p>Overlays Round Zone 3 Tranche 1 Cable Corridor Route</p> <p>Overlays Round Zone 4 Project 1 Cable Corridor Route</p>	Impact on Nationally Significant Infrastructure Project and cables	Concern that extension of site to include AAEI was not justified on ecological grounds
12	2 – until we know management measures won't restrict activities	Overlays Round Zone 3 Tranche 1 Cable Corridor Route	Impact on Nationally Significant Infrastructure Project and cables	
RAYH 1	1	Overlays Round Zone 3 Tranche 1 Cable Corridor Route – suggest micro site 2 km away from corridor	Impact on Nationally Significant Infrastructure Project and cables	
RANE 2	2	Not TCE responsibility however this is an unacceptable location for a reference area due to oil and gas activity	Restriction of oil and gas activity	
NG1 3	2 – until we know management measures won't restrict activities	Overlays part of the Narec site	Impact on testing centre for Nationally Significant Infrastructure Project and cables	

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



## Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: **Kirsten Smith**

Sector represented: **North Sea Wildlife Trusts**

Regional Hub: **On behalf of all hub groups**

Please explain briefly how the feedback you are presenting was collected:

**Internally within the Wildlife Trusts and following wider discussions with other NGOs**

Please indicate how many people you have been able to discuss this feedback with: **10**

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

## **General feedback:**

- dMCZs are still being identified or cut back based on socio-economic not ecological grounds. Sites should be selected using ecological principles and the ENG, socio-economic concerns should be considered and outlined within the project's Impact Assessment.
- Eunis data detailing Broad-Scale Habitats is taken as an indication of biodiversity of an area. Eunis data identifies where habitats are located but not their ecological value.
- Reference is continually given to pelagic importance of an area, this must be considered alongside benthic importance to give an overall picture of the site in question – see MBA benthic biodiversity biotope data layer
- AAEl may not be the core designating features for MCZ sites but should still be considered when looking at further features of site importance e.g. by protecting BSHs, such as subtidal sand we will likely afford some protection to sand eel populations which will then therefore have a wider benefit for seabird and cetacean species. AAEl should be used in particular for site determination when there are two similar areas of BSH being considered. The preference for site designation should go to the BSH site that has the highest AAEl rating.
- dMCZs have not been proposed in highly biodiverse areas such as the Durham heritage coast and Flamborough Heligoland frontal system, these areas require further consideration. In the case of frontal systems the water column may not be a feature for identification of an MCZ but the seabed below it could be protected, i.e. if a frontal system is found above a BSH it is likely the BSH below will be of high ecological importance as a result of high nutrient levels within the water column above.
- There needs to be the up most clarity regarding the features for designation within each dMCZ. In several cases confusion seems to have arisen within this submission regarding which feature is actually to be designated as part of sites.
- There continues to be the assumption that features will be 'maintained' rather than 'recovered' and that all activities will continue to operate within dMCZs. Site conservation objectives need to be considered for 'recovery' unless evidence suggests otherwise, applying the precautionary principle.
- Further consideration needs to be given to highly mobile species within the Net Gain project area, i.e. European eel, Smelt and Undulate ray. To date sites have not been specifically identified for these species. Further investigation for these species needs to occur in areas such as estuaries where these species are most likely to be found.
- Further consideration should be paid to the REC bathymetric data layer alongside the EUNIS level 3 layer in future meetings to provide a more detailed picture of the ecosystems found within specific dMCZs.

Site ID	Level of support for site, score from 1 to 4: 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
NG1 – Suffolk Coast	<p>4 – strongly support original site designation NG1</p> <p>1- strongly against dissemination of this area into four smaller sites</p>	<p>The site labelled as NG1 appears to be divided into five not four sites, NG1, 1a, 1b, 1c, 1d. We recommend keeping the site labelled as NG1 in its entirety as it encompasses four differing broadscale habitats, subtidal sand, subtidal mud, subtidal mixed sediments and subtidal coarse sediment. All of which should be identified as features of this site.</p> <p>As well as incorporating a mosaic of BSH this dMCZ also co-insides with an SPA for the Outer Thames, demonstrating the area to be of considerable pelagic ecological importance. By affording the subtidal sand within this region protection we offer some protection to the species living within the sediment, which then benefits the seabird species foraging within this region. Splitting this site into four smaller less significant ecological areas where fewer socio-economic activities occur will allow only limited protection of either the BSHs or marine wildlife within this region. When considering the boundary of this site at future meetings benthic importance of the seabed needs considering alongside pelagic to provide a full picture of the ecological importance of the seabed within this region.</p> <p>We would only support the loss of some of the area NG1, if as a way forward additional areas were considered as MCZs within this region. For example by removing a section of the Northern region of NG1 i.e. the area corresponding to coarse sediment and by creating an offshore area for coarse sediment around ‘biodiversity hotspot 26’, (an area of high AAEI and a commercial fish spawning ground) we would establish two sites of high ecological importance both in terms of BSH and AAEI. The smaller revised version of NG1, i.e. the mid-southern region would still incorporate three BSHs subtidal sand, mud and subtidal mixed sediment and would still be high in AAEI overlapping the Outer Thames SPA. This would create a win-win situation, create two reasonable sized areas and incorporate AAEI as well as protecting a known whiting, herring, sprat, plaice and sole spawning ground which in the long term may create long term benefits for fisheries within the region.</p> <p>Further consideration should be given to the Ale, Ore and Blyth estuaries regarding how they feature as part of NG1 or whether best to feature them as separate MCZs, seek further advice from the Environment Agency regarding this. Consideration should also be given to highly mobile species which may occur within these estuaries, such as Smelt or European Eel. If present these should be identified as features of these sites and have conservation objectives established for their protection as deemed appropriate.</p>		

<p>NG2 &amp; RA EE1 – Cromer Shoal Chalk Beds</p>	<p>4 – strongly support the designation of this site and identification of reference areas within this region</p>	<p>We welcome the presence of site NG2 and the identification of high and moderate energy infralittoral rock, moderate energy circalittoral rock and littoral chalk communities as features of the MCZ. Subtidal chalk should also be listed as a feature of this site, alongside subtidal sands and gravels. The data available to identify the presence of these features may be ‘modelled’ but still constitutes as ‘best available evidence’ a requirement of the ENG, this information should therefore be used. We also note that verification regarding the data collected showing blue mussel within this region be verified. We can say with confidence, as funders of the recording programme that has collected this information that this data is accurate, having been collated using trained dive surveyors. This data again constitutes as best available evidence which should be used when considering this MCZ.</p> <p>Pelagic importance for this region is noted as low however ecological importance should be assessed using both pelagic and benthic data. This area has been identified through dive survey as one of high benthic importance, incorporating what has now been labelled as potentially ‘Europe’s’ largest chalk reef’. This area has not been considered in the past for other seabed designations as data is only newly emerging showing this FOCI habitat. This process allows for and should embrace new evidence as it comes to light. By incorporating this data we allow for an accurate MCZ to be established and mapped according to the feature which is present.</p> <p>When considering both the subtidal chalk and blue mussel beds within this region it is worth noting the data highlighting these features is accurate and there is both the ability and willingness from local Wildlife Trusts and Seasearch East Anglia to monitor these sites in future. Alongside the lack of commercial exploitation currently undertaken on these FOCI, they create excellent examples of ‘reference’ conditions of these habitats within the Net Gain project region.</p>		
---	---	--	--	--

<p>Wash &amp; North Norfolk coast RA-LW1 (peat and clay) &amp; RA-LW3 (coastal saltmarshes &amp; saline reedbeds).</p>	<p>4 – strongly support</p>	<p>We support Natural England’s recommendation of considering FOCI species using common sense. Good examples can be found at Norfolk Wildlife Trusts Cley National Nature Reserve. The local Wildlife Trust have good records of their location and regularly monitor the species, this area may serve as a suitable reference area for this species and should be considered at both the Lincolnshire and East of England hub groups in future.</p> <p>We welcome the presence of reference areas for coastal saltmarsh and saline reedbed BSH as well as peat and clay exposures. RA-LW1 appears very small in size, there appears to be limited information detailing the level of records of peat and clay exposures found here. If this site is based on one record only it would perhaps be more suitable to seek an alternative peat and clay reference area, such as those found on the North Norfolk Coast.</p> <p>The appropriate discussions surrounding the inclusion of Gibraltar Point as an MCZ are yet to be had as a result of information not being presented to a detailed enough scale in Lincolnshire hub meetings. At future meetings in order to have adequate discussions regarding the designations currently afforded to and around the waters of Gibraltar Point detailed maps are required showing the features that the SSSI does and does not cover to establish whether or not further protection is required. There appears in the submission to have been confusion in the reporting of this site, noting peat and clay exposures to have been considered as the only reasoning for identifying this site for designation. According to page 60 of the ENG Gibraltar Point should primarily be considered as a site of geological importance, as these discussions were unable to occur in detail during the last round of hub meetings due to the lack of information presented for this area they needed to be re-visited at future hub meetings.</p>		
--	-----------------------------	--	--	--



<p>NG4 – Wash Approach</p>	<p>3 – support – clarity needs to be given regarding actual features for designation. We would strongly support the designation when clarity was obtained.</p>	<p>We welcome the identification of site NG4 and the inclusion of all BSHs as designating features within this site. As the submission notes local evidence of Thornback Ray to the east of the inner dowsing, this should also be included as a feature of interest, although it is not a designating features its presence can be noted as an indication of biodiversity within this site.</p> <p>We welcome the identification of the reference area for Sabellaria reefs. However confusion seems to have arisen within the submission regarding what the reference area has been identified for, this needs clarifying. Page 55 refers to the reference area as a site for Sabellaria reefs, page 56 table 6.4a outlines the RALW2 reference area features but only lists subtidal mixed sediments and fails to mention Sabellaria as even present within this area. This needs amending/clarifying. Although the information available for Sabellaria is based on modelled data, at this current time the modelled data is the best available evidence we have and should be used to inform decisions. Reference areas for Sabellaria within the inner dowsing existing SAC? are likely to be in good condition as a result of the existing designation and therefore provide good reference sites for future scientific monitoring.</p> <p>The reference area currently identified for subtidal mixed sediments, given on page 58 of the submission document shows the site to cover a large proportion but not all of the feature. The reference area should be mapped to the feature itself and therefore extended in size slightly westwards to capture all of the feature present.</p>		
<p>NG5 – Lincs Belt</p>	<p>4 – strongly support</p>	<p>Although not a designating feature, the area has been identified as important as a wintering and foraging area for seabirds and seals, making it an area of high ecological importance. These features should be referenced within the designation of this site to demonstrate its importance to the Net Gain network.</p> <p>Considering the size of the area and ‘strange’ nature of the shape of the coarse sediment within this site it may be more appropriate to also consider the subtidal sand BSH found within this site as a feature also as the majority of the site will be managed for coarse sediment it would make sense to also monitor the subtidal sand surrounding it.</p> <p>We also recommend that this site is merged with NG8, of the Yorkshire and Humber hub creating a more coherent protected area. Ease of management should not be the primary consideration when determining if to merge or split this site.</p>		

<p>NG6 – Silver Pit</p>	<p>4 – strongly support</p>	<p>We strongly support the designation of the Inner Silver Pit as a feature due to its unusual geology and associated faunal assemblages, both of which should be referenced regarding designation in addition to the BSH the site has been identified for in order to demonstrate its ecological importance to the Net Gain network.</p> <p>We feel common sense should be applied to further designations within this site and suggest further consideration be paid to the possibility of a reference area for FOCI Sabellaria reefs, particular attention should be paid to the southern region of the site which incorporates a de-licensed aggregate area where reefs are found. This could provide a win-win reference area and requires further consideration.</p>		
<p>NG7 – Markham’s Triangle/Hole</p>	<p>Neither support or disagree - neutral</p>	<p>We welcome the presence of offshore MCZs and in general feel these are somewhat lacking within the Net Gain region. As a result it is crucial these offshore sites are placed in the most ecologically diverse sites as possible. This site appears as rather a strange choice of site with limited benthic biological value. It would be more suitable to substitute this site for the East of England ‘biodiversity hotspot 26’ which also encompasses coarse sediment BSH as well as AAEL in terms of seabird foraging areas and commercial fish spawning grounds.</p>		
<p>NG8 – Holderness Inshore</p>	<p>4-strongly support – however clarity is needed regarding designated features</p>	<p>This site is an ideal site for an MCZ as it encompasses a range of BSH, FOCI features and has been an existing no trawl zone for sometime, which has inevitably contributed to its high benthic diversity. It is important when considering this site in terms of ecological value to consider its benthic importance alongside pelagic importance as it scores relatively low in terms of pelagic diversity but highly for benthic.</p> <p>Reference areas should be considered within this area in future for BSH coarse sediment, FOCI features and geological features such as the Binks. The Binks is outlined within this submission as being identified as highly mobile, following up on local expertise for the site it appears the height of the sandbank features here are highly mobile, changing regularly however the underlying geology is not mobile and should therefore still be considered for designation as it is highly unlikely to change location. The site was dismissed from discussion during the last YH hub meeting as not enough information was available regarding the geology of the site to allow for further detailed discussions to continue, this should be re-visited.</p> <p>There is an omission within this submission document regarding peat and clay exposures as site features for this MCZ. These FOCI were identified as a feature of the site but have been omitted due to confusion regarding reference areas within this locality. The FOCI were not identified for reference but should still appear on the MCZ designation list as a general feature.</p> <p>We also recommend that this site is merged with NG5, of the Lincolnshire hub creating a more coherent protected area. Ease of management should not be the primary consideration when determining if to merge or split this site.</p>		

<p>NG9 – Damnation Alley</p>	<p>4 – strongly support</p>	<p>We welcome the identification of this site and feel it demonstrates the positive working relationships that are being created between the fishing industry and conservationists involved within this process.</p> <p>We have concerns regarding the BSH areas being removed from the site, i.e. the subtidal mixed sediment and think this needs further investigation. It would be a better solution for both wildlife, industry and management if the subtidal mixed sediment was kept as a feature alongside the coarse sediment rather than remove the central area of the site. Further consideration needs to be given to the conservation objectives and management of this site to determine the vulnerability of the subtidal mixed sediment. It would likely be a better solution to include both of the core features of this site and allow potting to continue than create wide open expanses of totally unprotected BSH.</p>		
<p>NG10 – Castle Ground</p>	<p>4 – strongly support</p>	<p>As the only fully intertidal site identified within the Net Gain region we strongly support the inclusion of all the intertidal BSH within this MCZ. Following discussions with the Filey Brigg volunteers we feel this site should be extended seaward to include further intertidal BSH and the FOCI intertidal underboulder communities, this would also allow for the wider protection of foraging seabirds within this area, in accordance with suggestions presented by RSPB at the last round of hub meetings.</p> <p>Following the Marine and Coastal Access Act the boundaries of this site need to be referred to in terms of the Mean High Water Springs mark, the default limit for MCZ site designation.</p>		
<p>NG11 – Boulby Zone</p>	<p>Neither support or disagree - neutral</p>	<p>Clarity is still required regarding subsidence in this area. It may be more appropriate to find this BSH elsewhere in an area with greater stability and wider AAEI features. At present this site has been identified purely as the habitat occurs here, it would be more suitable to look for this habitat elsewhere and consult with the NE hub. Areas of the Durham Heritage Coast, such as an area incorporating AAEI could be used as an alternative site choice.</p>		
<p>NG12 – Compass Rose</p>	<p>3 - support</p>	<p>We support the designation of the area for moderate energy circalittoral rock, but feel it would be more beneficial to extend the boundary to the south or move the entire site southwards to incorporate both the key BSH and the highly productive frontal system above. It is likely due to the presence of the frontal system that the seabed directly below is high in terms of diversity, in this sense it would provide a greater protection to marine wildlife to move the site to the south or change its boundaries slightly.</p> <p>Regarding the reference area within this region there appears to have been some confusion in reporting. A reference area would meet the targets for the presence of a reference area for BSH moderate energy circalittoral rock however in terms of ecological value and scientific monitoring a reference area for this type of BSH would be far more appropriate within the Farne Islands SAC, within an area of known high ecological diversity and an area which is subject to a high degree of scientific monitoring. This site should be the priority choice for this type of BSH.</p>		

RA-YH3, RA-YH4, RA-YH2 Flamborough Head	4- strongly support	<p>Horse mussel beds are an ENG FOCI habitat, requiring between 3-5 replicates across the Net Gain area. As a result of only two known horse mussel beds within the Net Gain area both should receive designation. RA-YH3 of the two would be more suitable as a reference area as occurs within the existing SAC boundary of the Headland and is likely to be in good condition.</p> <p>We would recommend extension of the RA-YH2 identified for littoral chalk FOCI as this site is currently small in size and currently is mainly within the intertidal region. Extending this area into the subtidal would provide a useful scientific comparison with the existing intertidal region. We would encourage further discussions to be had around this existing No Take Zone as it already has some support associated with it from local stakeholders.</p> <p>Further consideration also needs to be had regarding the presence of high energy circalittoral rock and whether or not this area should be recommended as an MCZ. As the only suitable area of circalittoral rock within the Net Gain project area this site should be put forward as a potential reference area, however if there is little consensus/support for this site this should also be noted and details given in the impact assessment.</p>		
NG13 – Coquet to St Marys Island	4- strongly support	<p>We are encouraged to see the identification of this site based on ecological grounds and pleased to see the inclusion of all BSH as features. We are also pleased to see the inclusion of the AIn estuary as a separate MCZ, consideration should be given to include highly mobile species as features within estuarine MCZs.</p> <p>Further consideration should be given regarding the FOCI <i>Artica islandica</i> and Common Maerl as to whether to include these as a features for this site. This appears to be the only site in which Common Maerl is found so should be listed as a FOCI feature.</p>		
NG14 – Farnes East	4 – strongly support	<p>The area around the Farnes is one of the most ecologically diverse sites within the North Sea for benthic and pelagic diversity; we therefore welcome the identification of Farnes East as a site.</p> <p>We are keen to see further consideration given to reference areas within the region both for subtidal mud (between the Tyne and Tees) and for the moderate energy infralittoral rock (and associated kelp forest) and circalittoral rock (and associated faunal turf) within the Farne Islands existing SAC. A reference area within this locality would be regularly monitored and evaluated for scientific purposes by NGOs and Seasearch North East allowing a comprehensive picture to be built regarding the marine environment here. A good level of records are also available for this site for historic comparison also justifying its inclusion as a reference area.</p>		

NG15 – Rock Unique	4 – strongly support	We welcome the identification of this site and as it is the only example of low energy circalittoral rock within the Net Gain project area we are encouraged to see a reference area also created for this habitat type. We are keen to see the reference area identified also covering the surrounding BSH, to provide an important buffer area around the key rock feature. This area is also an area important for foraging seabirds and should be listed as a supporting feature of the site.		
Durham Heritage Coast		Needs consideration for BSH MCZ protection – potential to use this area to make up targets for high and moderate energy infralittoral rock if the Boulby YH site is lost.		
NG16 & 17 – Swallow sand and Ekofisk	4 – strongly support	<p>We welcome the identification of these sites however are keen to encourage the use of the MBA benthic diversity-biotope data layers if the boundaries of these sites are to be moved/changed at future hub meetings. The benthic diversity data layer should be used when identifying reference areas within these sites to ensure they capture ecologically important areas of seabed.</p> <p>Although data is lacking regarding presence of FOI seapens, future consideration should be given to these species within this region as it is likely they occur within these sites, refer to DASSH data.</p>		

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG

### Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: Bob Coates

Sector represented: Framborough Fisherman's Society

Regional Hub: Yorkshire and Humber

Please explain briefly how the feedback you are presenting was collected:

BY WORD OF MOUTH, AT PLACES OF WORK AND SOCIALLY (OK - PUBS)

Please indicate how many people you have been able to discuss this feedback with: TWENTY OR SO

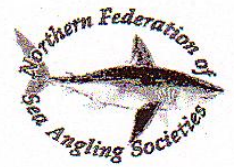
For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

NO, THE SITE VISIT FROM PETE HANSELL WAS ITSELF VERY HELPFUL. IT SHOWED A FACE INSTEAD OF A REAM OF WRITTEN INFORMATION AND HE BROUGHT THE LARGER SCALE MAPS WITH THE AREAS INDICATED.



Site ID	Level of support for site, score from 1 to 4: 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments
EAM B HEAD.	4	THE GENERAL CONSENSUS BEING THAT IF LEFT AS IT IS, THE RSPB SITE AT REMPTON IS DOING WELL, GANNETS INCREASING YEAR ON YEAR, THE SITES FOR HORSE MUSSELS, TAKES CARE OF THAT REQUEST AND LOCAL POTENTIAL BE LEFT ALONE AS IT HAS PROVED TO BE SUSTAINABLE OVER THE YEARS. A 3rd REC AREA WOULD BE DISASTER FOR THE LOCAL FLEET.		

When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
 Net Gain  
 The Deep Business Centre, Tower Street  
 Hull, HU1 4BG



RSA Feedback site ID NG13 “ Coquet- St Marys”

This feedback was obtained via 2 North East RSA forums individual e-mails from myself to known RSA along with visits to RSA shops and through my own club, Amble Sea angling and the Northern Federation of Sea Angling Societies 3000 members and 963 forum hits.

Regarding the next iteration.

Virtually all of the RSA contacted and given your report where unable to understand the several hundred pages using acronyms and language that most did not understand and it was suggested that it is written in a way that only achedemics could understand. This was then broken down to pages 101 to 105 (report not pdf) NG13 . I believe the other sites will have a zero impact on RSA in this hub region.

A report that could be read by the man in the street would be good and help allay suspicion held within the RSA world that it is written that way on purpose. This will help me collect views without having to translate the report into everyday language.

Site score generally was 2 mainly because they found the report unreadable therefore did not understand it hence the score 2. 5 of the several hundred gave it a 3.

Regarding suggested adjustments, impact, management, most had the opinion that why fix something that is not broken in Coquet – St Marys they could not see any benefit from the suggested site from how it is today.

If RSA was to be restricted in this area it would be fought by the Northern Federation of Sea Angling societies and it was suggested that any such ban would be ignored by many under the fundamental right given by the Magna Carta.

Any other comments.

I was under the impression that the eastern line of NG13 at the two island ends would only run out east to the 6 mile limit, according to the published map this is not so. I believe it would make sense to keep this site within the 6 mile limit so management would be under the jurisdiction of the local IFCA.

Finally I must raise a strong concern that having taken an active role, both in the hub and in trying to consult with my sector that you hold a meeting on the same day as another major DEFRA conference in London. I believed this NG meeting to be a MMO training day and I now read that you intend to discuss reference areas in the afternoon, one of the most emotive subjects for my sector. Both I and my named second are attending this London meeting so we are unable to represent the views of my sector therefore in my opinion any decision made at this meeting regarding the



placing of a reference area in this MCZ Coquet-ST Mays would not be stakeholder led.

Regards  
Les Weller

**Minutes of the Meeting with the Lowestoft Fishermen**  
**Friday 18<sup>th</sup> February 2011, at 09.30 in the Europa Cafe, Lowestoft Fish Docks**

**Present:** Tammy Stamford (NG), Darren Mariott (Lowestoft/Southwold Fisherman and EE hub member) and up to 8 members of the Anglian Fishermen's Association.

- Informal discussion about dMCZs from the 3<sup>rd</sup> Iteration. TS gave description of what each zone would be put in place to protect.
- Issues arising:
  - Difficult to say whether they are in support of an area until they know what is going to be allowed to continue in that area.
  - Several members of the association fish in NG1. Mostly within the 6nm limit.
  - DM explained that 1a, b, c and d had been proposed by their table instead of the original site NG2.1 because they satisfy the network guidance but are of less of an impact to the people using the area within 3nm of the coast.
  - NG 1 supported by NGOs and NFFO but not commercial fishermen.
  - Would like more concrete answers on management measures and restrictions. Group felt it was difficult to give feedback without more information.
  - Sediments change around the coastal more often than every 6 years. Will review process be sufficient to really take into account changes?
  - Worries that once an MCZ is in place management measures will become more stringent over time.

**Minutes of the Meeting with the Orford, Aldeburgh and Felixstowe Ferry Fishermen  
4pm on 22/02/2011 at Bart's Hall, Orford**

**Present:** Tammy Stamford (NG), Roger Hipwell (Orford and District Inshore FA Chair), Richard Marson (Aldeburgh Fishermen's Trade Guild Chair), Jacki McNeill (Aldeburgh Fishermen's Trade Guild Secretary), Alan Garnham (Eastern IFCA) and at least 10 other commercial fishermen.

- TS showed chart of dMCZs from 3<sup>rd</sup> Iteration. Explained what each site would protect.
- James White (Felixstowe Ferry Fisherman) explained selection of 1a, b, c and d.
- Issues raised and comments made:

**General**

- Discussion surrounding classification of trawling. Ideas for trawling classification were trawl door size, engine power (although most believed this not to be the best method of differentiation), and vessel length. AG noted that it would be much easier for the IFCAs to police if vessels are managed according to length, specifically under 10m and over 10m. AG noted that when looking at a boat at sea with binoculars it is difficult to see what is happening under water, but that boat identification (and therefore knowledge about the length of vessel) would be possible.
- Suggestion from the group to include exemptions for local fishermen with under 10m boats.
- Group support restriction of larger, European vessels since there is often conflict with these vessels over stolen or damaged gear anyway.
- Commercial fleet part of wider social network and local economy – producers, restaurants, shops, tourism, cultural heritage etc.
- The group would like to be consulted after the next round of meetings and kept up to date until the end of the process.
- Would like to request a meeting with our Project Manager Joanna Redhead next time.
- Concern about management measures post designation. Concerns about restrictions starting off as lax and becoming more stringent over time. If NG1 removed from the network, there would be no question of tweaking the rules about fishing restrictions at a later date. The other suggested zones are preferable.

**NG 1**

- Strong opposition to NG1. The majority of boats in the area are small vessels restricted as to the distance they can travel through vessel size and limited engine power. Restrictions on fishing effort in the area would impact on the local fleet and subsequently local communities.
- This would be acceptable if the activities of the local boats are not restricted.

**NG 1a**

- Broad support for NG 1a.

**NG 1b**

- Support from most of the group (but not all – a few fishermen go wreck potting in 1b) for NG 1b.

**NG 1c**

- NG 1c slightly more controversial – the group thought it would be unnecessary to put another layer of legislation over the Alde and the Ore, however, there were no strong objections and the suggestion was preferred over and above NG 1 which was strongly opposed. The question of anchoring in the Alde and Ore estuary was raised, since there is a yacht club that operates in the area.
- Concerns from AG about the implications for anglers of site 1c. Orford Ness receives high numbers of anglers during the peak season (April through to November, with the summer period being particularly busy).

**NG 1d**

- No comments.

**Minutes of the Meeting with The North Norfolk Fishermen's Association  
7pm on Wednesday 23<sup>rd</sup> February 2011 in The Cottage Pub, Cromer**

Present: Tammy Stamford (Net Gain), Hester Clack (Natural England), Billy Gaff (Chairman), Fran Weatherhead (Secretary) and up to 25 members of the Association.

- Introductions.
- TS passed round the charts, explaining which features would be protected within NG 2.
- Issues/comments/questions:
  - BG noted juvenile mussel beds have now been found within NG 2 and they are working with the Eastern IFCA to determine how they should be managed.
  - The group can confirm the reference area for mussel beds put forward by Rob Spray is not fished.
  - What are the implications for fishing in reference areas?
  - What about wind farm cable routes? Why haven't we stopped them? The cable corridor coming into Weybourne is damaging lobster fishing grounds. Ans: MCZ not in place yet and unlike other protected areas, when an MCZ is in draft format, it does not afford the area any legal protection. Also a government push for renewable energy so is a delicate balancing act for Net Gain – must work with all sectors to achieve compromise.
  - If the fishing activities have been here for hundreds of years and the features are there now, then the activities of the inshore fleet have not damaged them and should not be restricted.
  - BG attended MMO workshop a number of weeks ago and felt that fishermen were under-represented at that meeting. TS explained make up of EE hub.
  - HC asked Roger Seago and John Lee how they felt the hub meetings had been going. Roger Seago felt that fishermen were at a disadvantage and when questioned this seemed to be due to the other representatives/organisations in the room. John Lee was pleased he had joined the hub, regrets not getting involved sooner and felt that at the last meeting they had a good opportunity to express their Association's views. Both expressed worries about reference areas and would like a more definitive answer on what they will and will not be able to do in an MCZ.
  - The group asked if they would be involved in the decision making and would they be able to have a say on location of chalk reference area and types of restriction etc. Ans: We would like to work with them to select reference areas in places that they feel are most suitable. Our next discussions about management measures will take place at the EE hub at the end of March, which John and Roger will both be present at. The MMO will also be consulting local FAs about management measures so there will be the opportunity to get involved in deciding on a management regime.

**Visit to the Aldeburgh Fishermen**  
**24/02/2011, time: various**

Tammy Stamford (Net Gain) met with Alan Clements, Allan Wood, Dean Fryer and Mark Foreman

Issues raised:

- Strongly object to site NG1. All the vessels fishing from Lowestoft down to Mersey fish within 3nm of the Suffolk coast. Communities in Aldeburgh, Orford, Felixstowe and Southwold would be most affected.
- Location of zone NG 1 exactly where Suffolk under 10m fleet fish (most important area for them) even though most fishermen have completed questionnaire. It seems that Net Gain have not done what they said they would do and avoid the most used areas. TS described distribution of habitats and species features present along that strip of coastline and explained why that has been selected. Also explained the set up of the hubs, use of information, role of economic impact assessment.
- Not comfortable if NG1 put forward even if it is believed that local fishing methods do not damage habitat – fears that any restrictions implemented initially would become more stringent over time. Worries the zone might become larger at the first review in 6 years.
- NGOs support NG 1 because their livelihoods are not at stake. The Fishermen stand much more to lose, should restrictions be applied.
- Please could they have a copy of the chart sent to Alan's home address.
- NG 1a, 1b, 1c and 1d all supported.
- Who is representing us on the hubs? TS listed EE commercial fishing hub members.
- Has the northern boundary of the original site NG 2.1 (now NG1) been moved south because the Lowestoft fishermen were shouting the loudest? TS explained method of working at hub meetings.
- How do we know that our views are being taken into account when we're just standing here talking? Ans: Liaison officers make a note of your comments and include them in a set of meeting minutes, which are written up and included in a file of evidence and discussions with stakeholders. Also stakeholders that sit on our hubs voice their concerns at the meetings and these are all put on record.
- Can we write and express our views? Ans: yes of course, we would be happy to accept any feedback/comments.
- Mark Foreman concerned about the amount of rubbish coming from the sewage outfall off Aldeburgh. When they haul in their nets, they are full of plastic and other materials from the sewage outlet. What influence would MCZ designation have on regulations relating to waste water disposal? Ans: uncertain, will need to follow up.

## Minutes of the Meeting with Wells Commercial Fishermen.

**Venue:** Golden Fleece, Wells.

**Date:** Wednesday 3<sup>rd</sup> March 2011

**Present:** Tammy Stamford, Dan Davis, Carl Pickering, Ben Riches, Richard Brazier, Robin Harris, Nicky King, Andy McCullum, Mark Frary.

### **Aim of meeting:**

- To explain the outputs from the last round of HUB meetings (3<sup>rd</sup> Iteration) and to gather feedback from the Wells Commercial sector representatives, and to gather feedback on Fishermap interview charts.

### **Fishermap Feedback:**

- Comments were made that the Fishermap needs overlaying from an acetate onto a Nautical chart to confirm the accuracy of the data representation;
- RB commented that he would not sign to agree to the data until the accuracy of the Fishermap chart was confirmed;
- It was commented that the Fishermap chart only gives a snapshot of activity and that fishing grounds for the Wells fleet may well change next year;
- The Windfarm activity was discussed and it was felt that the Windfarm locations needed overlaying onto a Nautical chart to show the issues of displacement to the fleet;
- It was commented that the Mobile chart may be inaccurate, but it was agreed that no changes needed to be made to either the Static or Mobile Fishermap charts.

### **3<sup>rd</sup> Iteration Feedback:**

- The Geological areas (marked in black on the chart) were questioned but TS explained that these were Geological feature areas;
- A 'heated' debate, involving all present, was started when it was pointed out that the Windfarm and Aggregate areas of activity do not seem to be effected by the proposed sites. It was explained that the current activity and licensed future activity will happen – that cannot be changed. What will happen is that there will be consultation and discussion around any future proposed windfarms or dredging in MCZs that are not already licensed;
- A question was raised, in conjunction with the 2<sup>nd</sup> point, that Commercial fishermen are not being consulted as to where MCZs are being proposed, but Government 'money-making activities' are getting what they want. TS and DD explained the modus operandi of the HUBs and that Commercial activity IS taken into account. DD asked if Wells had a HUB member but they have not – it was felt that they could not commit owing to fishing activity;
- AM pointed out that there was a meeting last year with Natural England and that they were assured by the NE representative that there will be no NTZ within the MCZ process, so why are there now Reference Areas? DD assured them that this would be investigated;
- It was asked as to whether the Wells fleet could have assurances/guarantees that fishing will be able to continue in NG5. TS and DD stated that they cannot answer that question;

- A discussion was raised about the MMO activities/agenda and that they will simply make the Management measures where MCZs are concerned without listening to anyone. One attendee (NK) walked out saying that he will not discuss the MMO;
- DD pointed out that according to the HUB report, NE have given assurances that potting is likely to be allowed in NG4;
- It was noted that the Wells fleet will become far more interested in the MCZ process once Management measures are discussed;
- RH commented that fishermen still make a living from NG4 and the habitats therein, so why do they need protecting? Simply stop the windfarm and dredging activity in the area as these are killing the habitats, not the fishermen;
- AM commented that NE have discussed with the Wells fleet about a 50% reduction in pot numbers in the new proposed SAC area. DD commented that he did not know about this but would investigate;
- RH commented that this whole process is a 'smoke screen' and that the decisions have already been made by those 'higher up the food chain' – Net Gain is simply a way of arguing that engagement has taken place. There was no comment from TS or DD;
- It was noted that NG4 can be placed off the NE Norfolk coast – the same habitats exist there, so why have a site that could affect their livings?
- RH asked about the future changes to MCZs if put in place? The room wanted confirmation that they will not become NTZ in the future – TS or DD could not give that assurance or comment any further;
- Those present wanted it strongly noting that they do not want MCZ NG4 or the Reference area;
- The windfarm pipeline/cable was discussed and why it had to go straight through the Wash? Why could it not go the Skegness, a shorter distance? And why have NE put a SAC in the Wash, then the Government gives permission for a pipeline to be run through it which will destroy the ground?

**Dan Davis**

**04.03.2011**

#### **Additional Minutes (TS):**

- The wind farm activity has already caused displacement of fishing effort. Worries that other areas will become more intensively fished and are therefore more likely to face restrictions.
- The things we are protecting are already there so it is unlikely that the fishermen are damaging them.
- Suspect Defra will make popular decision – the one that will win votes.
- Feel disadvantaged because they don't have professional representation in the same way as the renewable, aggregates or NGOs. Acknowledgement that this is due to the nature of their industry and the individuals involved.
- Fishing associations have members that sit on North Norfolk Flag. Feel this body might be interested. Please contact Sandra Bush (North Norfolk District Council).



## Minutes of the Meeting with Withernsea Commercial Fishermen.

**Venue:** John White's House

**Date:** Thursday 17<sup>th</sup> February 2011

**Present:** Dan Davis (Net Gain), John White.

### **Aim of meeting:**

- To explain the outputs from the last round of HUB meetings (3<sup>rd</sup> Iteration) and to gather feedback from the Withernsea Commercial sector representative.

### **Feedback:**

- John mentioned FLAG – the Fishermen's Local Action Group, and whether Net Gain should be involved? Contact Ray Williamson 01482 391613.
- The Group works from Flamborough to Spurn and is funded by Defra.
- John is very concerned about the amount of potting that is taking place in his fishery (Flamborough to Spurn). The fishery will eventually collapse.
- John is concerned that some vessels from Bridlington are hauling their pots at sea and sorting through them on land. By doing this, any bye-catch is dead by the time it is returned to the sea. Why do they not sort it at sea? That way, far more of the bye-catch will survive.
- John is happy with the proposed sites as long as potting is not effected.
- He is concerned that the IFCA will not want to upset anyone when policing the areas. Also, how are they going to have the manpower to police them?
- John has spoken to James Marsden previously about adding escape hatched to pots – James seems interested but nothing further has come of the discussion.
- John feels the number of pots should be restricted by vessel and that the larger vessels should be kept out of 3nm. Can the sea not be zoned by vessel size?
- The area is smothered with pots and has already lost the whelk and velvet crab fisheries. Lobsters and crab will eventually disappear due to over-fishing.
- Vessels should target various species at different times of the year, not just relentlessly targeting one species all year.
- John mentioned the Binks as an MCZ but doesn't feel that much can live there.
- John mentioned the Langed pipeline and how they dug a large trench, then totally smothered the area off Easington, killing off much of the life there.

**Dan Davis**

**24.02.2011**

## **Minutes of the Meeting with Grimsby Commercial Fishermen and Charter Boats.**

**Venue:** Jubilee Cafe, Grimsby.

**Date:** Thursday 17<sup>th</sup> February 2011

**Present:** Dan Davis (Net Gain), Ray Stratford, Jeff Ball, Janeen Willis.

### **Aim of meeting:**

- To explain the outputs from the last round of HUB meetings (3<sup>rd</sup> iteration) and to gather feedback from the Grimsby Commercial and Charter sectors.

### **Feedback:**

- All present at the meeting are happy with the zones as long as they are still able to carry on their current activities. Both Jeff and Ray feel that they carry out conservation every day by doing short trawls and sorting their catches at sea. They also use very light gear which hardly effects the sea bed.
- Janeen operates a catch and release policy for all undersize fish – nobody is allowed to keep any undersize fish – it is the rule.
- Looking closely at the charts, the proposed sites are very rarely worked by anyone present so it will not really effect them.
- No-body present wanted a Reference area putting near their areas of activity.
- It was mentioned that Jim Walker, another Commercial fishermen in Grimsby has added escape hatched to his pots and this works very well for conservation – he catches very few undersize lobsters and releases those that he does catch immediately.

## Minutes of the Meeting with King's Lynn Commercial Sector.

**Venue:** Lynn Shellfish, King's Lynn.

**Date:** Friday 18<sup>th</sup> February 2011

**Present:** Dan Davis (Net Gain), Steve Williamson, Bob Garnett, Paul Garnett, 7 Lynn Skippers (10 total).

### **Aim of meeting:**

- To explain the outputs from the last round of HUB meetings (3<sup>rd</sup> Iteration) and to gather feedback from the King's Lynn Commercial Sector.

### **Feedback:**

- NG4 (Burnham Flats). There was a unanimous opinion that the proposed Reference site will have major implications for the Lynn fleet. It was requested that the exact lat/long coordinates be found so that they could mark the area exactly on a nautical chart. DD rang CP in the office and the following coordinates were given;

Lat1: 53° 13' 49.1808"

Long1: 0° 46' 14.1852"

Lat2: 53° 13' 54.1374"

Long2: 0° 50' 43.6452"

Lat3: 53° 11' 12.447"

Long3: 0° 50' 51.7524"

Lat4: 53° 11' 7.497"

Long4: 0° 46' 22.5768"

- The coordinates were placed on a Nautical chart and it was agreed that the Burnham Flats fishing ground will be lost to the Reference area. It was felt that it was unacceptable to have a Reference area there.
- One comment was made that it doesn't matter what is agreed or not agreed, experience has shown that Natural England will do what they want anyway.
- It was asked what habitats or features the Reference Area is protecting and if it can be moved somewhere else. I said I will investigate and report back to Steve Williamson.
- The Survey work that has been carried out was questioned – over what period was it carried out? Was it months or years and how accurate is it? The Burnham Flats area has been fished for hundreds of years and still provides plenty of shrimp. It therefore cannot be in a depleted state so why stop fishing there? It can't be doing any harm?

**Dan Davis – 24<sup>th</sup> February 2011.**

## Minutes of the Meeting with Boston Commercial Fishermen.

**Venue:** Ken Bagley's House

**Date:** Friday 11<sup>th</sup> February 2011

**Present:** Dan Davis (Net Gain), Roy Brewster, Ken Bagley, Shane Bagley

### **Aim of meeting:**

- To explain the outputs from the last round of HUB meetings (3<sup>rd</sup> Iteration) and to gather feedback from the Boston Commercial sector representatives.

### **Feedback:**

- NG5 – an area South of Spurn Point, out to 3nm off the Cleethorpes coast almost down to Mablethorpe is in fact sand – members of the Boston fleet have been working that area for many years for cockles. We referred to Ken's nautical chart which backs up this theory.
- Shane and Ken both wanted clarification that Blue Mussel dredging can still take place in area NG5, and that some members of the Boston fleet, and King's Lynn fleet, beam trawl on occasions in that area for shrimp. I said that I would investigate and respond to them both.
- It was felt strongly that any MCZ can be worked as a sustained area, which the Boston fishermen have been doing for years. It is the dredging activity that causes the problems on the sea bed. Not only do they take away vast areas of habitat, but the silt causes enormous sediment plumes in the sea which covers vast areas of the sea bed. The theory that dredging companies calculate that any sediment plume disturbance will be limited in coverage is in fact untrue. It has been witnessed by many members of the Boston fleet that the sediment carries for many miles with the tide.
- The beach replenishment scheme on Skegness was discussed in depth and with strong feeling. The representatives feel that the sand moving with the tide is simply covering and killing most life down the Lincolnshire coast (from Skegness) and into the Wash. It was noted that a very large Rossworm reef off Skegness was killed off by this sand replenishment movements. There was also a vast reduction in the number of shrimp being caught off the Lincs coast, so much so that it was not a viable fishery any more.
- The Reference area in zone NG4 was discussed and it was agreed that these areas were needed for monitoring. However, it was noted that if a blue mussel bed, for example, is left as a reference site and not 'worked' (or cultivated), it would very quickly be overrun by Starfish and killed.
- It was discussed that mussel spat cultivation/removal only takes place for a very limited period each year (only for approximately 6 weeks) and would not affect the habitat within an MCZ for any sustained period.
- Roy stated that any cabling/windfarm drilling that affects chalk beds will release **arsenic** into the sea and virtually kill off all life that it comes into contact with. Is this taken into account when erecting windfarms or laying cables?
- Local knowledge stated that over the last few years there have been very few Jellyfish entering the Wash. It was speculated that the fall in numbers may be due to a lack of food caused by the beach replenishment scheme off Skegness?
- The representatives would like MCZs putting in to cover the Whole of the Wash and out past site NG4 to prevent dredging and windfarm activity. I commented that this was very unlikely.

**Dan Davis**

**14.02.2011**

## **Site Specific Feedback**

### **NG12**

- This area is not worked by vessels from the ports where interviews were conducted. Trawler skippers from Whitby said that this is an area that Beamers and Scallop fishers work and would like to see the grounds protected and any restrictions on these types of fishing would be welcomed.

### **NG 11**

- Fishermen from Staithes had no problem with NG11 which is an extension to the Whitby Prohibited to Trawling area. They would like trawling to be banned from the extension at the Northern end of the area.
- Fishermen from Staithes strongly believe that the northern end of NG11 is a very prolific breeding ground for plaice.
- Concerns from Staithes are that potting activities don't seem to have any restrictions being applied to them at this time but there are no guarantees that this won't happen in the future.
- Fishermen from Whitby have in general no problem with NG11 but two trawler skippers said that if trawling was banned at the northern end it would cause severe financial hardship as this area is good for Sole, Plaice and Haddocks.
- Fishermen stated that further restrictions to their already heavily restricted activities were unreasonable.
- Concerns were voiced by some fishermen about possible restrictions on Gill and Trammel netting.

### **NG10**

- The only feedback for NG10 was from anglers that were concerned what restrictions would be put in place, i.e. would they be prevented from angling or Bait digging.

### **Reference area YH2**

- Reference area YH2 is in an area classed as a NO TAKE zone.

### **Reference Area YH3 & YH4**

- Fishermen from Filey and Flamborough were both in agreement in the placement of both Reference areas.

### **NG 9**

- Fishermen from Bridlington were in favour of the placement of NG9 but stated they would like to see restrictions on Trawling and Scallop dredging.
- Some fishermen were sceptical of where the MCZ's would finally end up as history has proven once a regulation or designated area is in place it is very rarely relaxed and more restrictions are added.
- At the feedback meeting some fishermen were worried that if an activity such as Scalloping was banned then it could be taken by some that if potting boats fished outside an MCZ then they would become a target from the restricted vessels.
- The area around NG9 is an area where Wind farms are planned and cables from the offshore Wind farms are to be routed to the shore.

- Just how many more regulations do you want to us to absorb. MMO now wants to put a pot limitation in place as well as a Lobster quota.

### **NG 8**

- NG8 has a Prohibited to Trawling bylaw in place and the only concern of the fishermen from Bridlington and Hornsea is that if restrictions were put in place stopping the use of Gill or Trammel netting it would put financial hardship on them.
- If restrictions were put in place the inshore fleet would not be able to fish elsewhere as the Holderness coast boats are predominately under 10 metres and undecked and require the sheltered water NG8 affords in strong offshore winds.
- Health and safety would become a manger problem putting crews and boats in danger

### **General Comments from Stakeholders**

- How are they going to manage these areas as they cannot enforce the regulations that are already in place?
- The data that has been shown in the meetings that Netgain has held is very doubtful as years of experience say the opposite. To learn the true natures of the ground go static fishing.
- Fishing is said to be the most dangerous job in the world. Fishermen say the most dangerous part of the job is bureaucrats and their inexperienced paper ideas.
- It's a big con as aggregate dredging must be one of the worst destroyers of habit as when they have finished in an area there is no habitat left as they have taken it with them. This is conveniently overlooked as they pay crown estates thousands of pounds in licensing fees. MCZ are drawn round these areas. NOT so for important fishing grounds.
- Wind farms get the same treatment as the aggregate lot NOT so for the fishermen.

## **Site Specific Feedback North East Hub Region**

### **NG13**

- NG13 this area is heavily fished by vessels from a lot of the local ports. There is a lot of static gear fished in this area and if potting and salmon netting (T-nets) was to be restricted in the area it will have a massive effect on people's livelihoods and local communities.
- NG13 if for any reason potting is stopped in the area 50% or more of the static gear boats from Northumberland (Boulme, Craster, Amble,) will go out of business.
- Due to the size of commercial fishing vessels traditionally worked within the area NG13 they are restricted to how far they can work from the harbour from a HSE aspect. Any restrictions placed on the local fleets which make them fish further from shore could seriously endanger lives.
- Totally against any restrictions on trawling in these areas NG13 as it's very important ground for the local North East fleet.
- NG 13 out to 3 mile in places takes vital ground, to the under 10 Meter trawlers that tow for prawns on mud. It is vital that small Boats need sheltered places to fish.
- Zone NG13 is highly important for the potting and Static gear Fleet. If static fishing is stopped in this Zone the inshore fleet from the local area will be finished.
- 90% of the inshore fleet use this area, so consider moving it somewhere else that will not affect as many jobs and livelihoods.
- These Grounds have been fished for generations and still are proving their sustainability why change them?
- There are concerns that management measures could progress to impact on static fishing in years to come.
- The area back of the Coquet is trawled and is an important viable safe trawling area in bad weather.
- If there is any restriction on fishing in this MCZ it will push small under 10m boats further offshore endangering crews.
- If there is restrictions on potting in this area it will put the static gear fleets from Newbiggin, Blyth and Amble out of business.
- Off this area of coast there is wind farms are been put in by Narec so the fishing fleet in this area is already loosing fishing grounds.
- NG13 should not be extended out to sea as the area back of the zone is fished for prawns.
- Totally against any restrictions as 99% of the static gear fleet from the Tyne use this area.
- The zone NG13 should be reduced to ½ a mile and taken down to Hartlepool.

### **NG 14 N S**

- The proposed MCZ is now out of the area fished by the Berwick fleet.
- The area covered by NG14 N S is fished by The North East Fishing fleet especially vessels from North Northumberland.
- The Zone NG14 N S is ok as long as static fishing can continue to be operated within the site as this area is important for the earnings of the local inshore fishing fleet.
- Zone NG14 N S is fished both during the summer and winter months. If potting is restricted in this area it will have a massive displacement of gear and will affect the livelihood and earning capacity of many local fishing communities.
- The zone is within area fished. The zone could be better located in an area where less people make their living from the Sea.
- The pelagic productivity for the Farne deeps should be looked into and evidence should be produced on surveys.
- NG14 N S There is a lot of static gear fished in this area and if potting and salmon netting (T-nets) is regulated in the area it will have a massive effect on the local fishing communities.
- NG14 N S if for any reason potting is stopped in the area 50% or more of the static gear boats from Northumberland (Boulme, Craster, Amble, Seahouses) will go out of business.
- There are concerns that management measures could progress to impact on static fishing in years to come.
- The Zone is ok as long as static gear fishing methods are not restricted in the site and that in years to come further management measures are not brought in restricting static fishing (potting, netting & lining) in the area. (This concern was highlighted up and down the coast).
- Angling should be able to continue.
- Totally against any restrictions on trawling in these areas NG14 N S as it's very important ground for the local North East fleet.
- The closeness of the proximity of NG14 N S to the Farne Deep area was a concern and it was suggested that parts of it were located on important trawling areas close to and including the Farne Deep.
- This area is vitally important to the fishing fleets in the Northumberland and there is widespread concern and opposition in relation to this proposed MCZ.
- The shoreward side of NG14 should be moved further to the east and the seaward side should not move and take in more of the ground vital to the fleet.
- If there is any restriction on fishing in this MCZ it will push small under 10m boats further offshore endangering crews.

### **RA NE 3**

- The reference area is located on an important potting area for vessels from the Seahouses area and will affect livings if potting is stopped in this area.
- The reference area is in the wrong place for the peat and clay exposure. The area marked is larger than what was talked about in the meeting.
- The reference area is located on important potting ground and is fished with pots from Craster. Would not like to see any restrictions on potting in this reference area.



## **General comments on all proposed zones**

- There are not many fishermen left. The way rules and regulations are going without help there will not be any fishermen left.
- The size of the areas is frightening to fishermen. There is no clear indication of what kind of gear will be allowed to be fished in these areas.
- The science and Geology does not correspond.
- The size of the proposals is far in excess of what was originally put to the fishing industry and a huge amount of the industry will be adversely affected by these zones.
- These zones will have a huge socio economic impact as Northumberland is a rural county and relies heavily on the jobs created on the coastal fringe by the fishing industry (fish merchants, boat yard and engineers etc).
- Fear of gradual creep of legislation governing the zones. Once the zones are in place it would be much easier to add foundations and increase the measures in force.
- Strongly opposed to the current round of proposed MPAs/MCZs.
- Calculations suggest that the 5 proposed zones in our North East region Total over 2,500 Square nautical miles – they are bigger than the county of Northumberland.
- Dose the MMO/ JNCC / NE seriously propose to jump from one sucessfull MCZ around Lundy Island to taking over millions of archers of prime fishing grounds. If the proposals were to take small areas around Islands/ Headlands with great biodiversity whilst still contentious, they could be justifiably argued and monitored.
- Proposed zones for the North East are all at the north end of English waters- exactly where boats from the Tyne north to SE Scotland fish. There is virtually nothing south of the Tyne.
- If these zones are adopted, the scope for future impact on freedom to fish, commercial or recreational, is immense. The fact that current advice is that most fishing methods are compatible at present cuts no ice, as after designation rules will be strengthened as they have been in fisheries legislation.
- After a full and frank discussion with many fishermen and charter boat skippers. The level of trust present in the sea going community for Natural England/ JNCC proposals is negligible. The promise of Co- Operation is even less.
- The areas will have to be reduced in size as all 6 areas take in quality fishing grounds for whitefish, mackerel, salmon, trout, crabs, lobsters and prawns.
- The inability to be allowed to fish inside these areas would be catastrophic to all fishermen (shore and sea anglers included).
- The commercial fishermen are already heavily restricted with Quotas the amount of days at sea they are allowed to fish. We can't take any more restrictions.
- There was no need to close areas anywhere on the north east coast as there are already thousands of square miles of seabed that don't get touched with anything other than lobster pots which do no damage what so ever.
- Even the name does not resonate with fishermen, there is no NetGain in this for us, NetLoss would be a more suitable name for us.
- As a fisherman, I am fundamentally opposed to the concept of MPAs.
- However as we have no choice in the matter, we have to be involved in the process.
- The timeframe for the consultation process is too short, it needs to be extended by a couple of years, what's the rush, we are going to make a mess of this anyway.

- It's difficult for professional fishermen to work themselves into the consultation process, as they are fully committed working fishermen and usually do not have the time. Most other consulters are paid by their organisations and have the time and professional back up to be involved in this.
- I question the need for so many obscure organisations to be involved in the process, as these are not directly involved or affected in the potential outcomes.
- Unfortunately most fishermen do not realise what NetGain is about and how it will affect them. This is not the fault of the NetGain Team, it's just the way fishermen are. NetGain have distributed plenty of information on the project.
- The format of NetGain stakeholder consultation meetings is quite good. The charts/maps and the method of cross referencing different compatibility matrix's, has been well thought out and is well suited to the job in hand.
- I am very concerned at the huge amount of sea area that is being designated at an early stage for different purposes, which are very obscure and vague. We have no idea what management measures may be taken in future, which would drastically alter people's willingness to agree to these designations.
- Why does this all have to implement at one time. When the time comes, there are going tremendous problems when all this is launched at once. The MPA process should be a slow and gradual process over a few years, so it can be refined and altered as we learn more about how the system will work. Once set in place these designations are going to virtually impossible to alter, whatever the consequences.
- The scientific evidence supporting different designations is very weak and inconclusive, and sometimes incorrect.
- When the project was initiated we were led to believe that only 8% of sea would be designated as one form of MPA or another. Its looks to me it will be more than 35% now, much more than is necessary or appropriate.
- This will cause tremendous problems in the form of potential displacement for many fishermen, and no thought is being to the painful consequences this will cause. This will be very counterproductive in terms of MPAs as we will have areas of intense fishing activity and areas which are closed, producing no economic benefit to anyone.
- The area off the Durham coast is of great concern to the fishermen of Northumberland as there are no zones and they are all in the Northumberland area.
- Too much notice is been taken of people who do not know about the job. Not enough notice is been taken of the fishing industry as they are only trying to protect their livings.
- It is another possible restriction on top of what is already in place.
- It is of Great concern that some areas are so close to many small coastal fishing community's that depend on fishing for their livelihoods.
- It was suggested heavy mobile fishing gear could be potentially damaging to the habitat in the area and specific management may need to be looked into.

## Steve Barnard

---

**From:** Roger Hipwell [mailto:wellassociates.co.uk]  
**Sent:** 23 March 2011 12:49  
**To:** 'Orford Town Hall'; 'Anne Macro'; 'Anna Cornford'; 'David Goldin'; 'Derek Forbes'; 'Hugh Pilkington'; 'Joy Castle'; 'Margaret Green'; 'Mary Iliff'; 'Michael J Pearce'; 'Richard Mallett'; 'Richard Roberts'  
**Subject:** RE: NetGain feedback  
**Attachments:** Netgain feedback\_form 21-3-11 (2).docx  
**Categories:** Done/completed

The NetGain project has been working for 18 months now and has been trying very hard to engage (sorry for the modern jargon) with all stakeholders (sorry) to ensure fair and adequate representation in the Regional Hub (we are in the East of England Hub not NG1) meetings and has explained during those meetings the background to and content of the iteration (sorry) reports. I alerted the Trust last April about the potential impact of the MCZ project:

*Sent: Fri 23/04/2010 17:59 To: 'Orford Town Hall' "I have also passed information about the Trust's activities to the NetGain Marine Conservation Zones Project who are working to identify areas along the North Sea Coast to designate as protected zones. As a stakeholder who relies on revenue from angling and commercial fishing activities on this part of the coast the Trust should be providing input to ensure that their interests are represented or the fishing could be restricted and the revenue severely impacted as fishermen go out of business and anglers launch and retrieve boats closer to non restricted fishing areas.*

*As I attend regular meetings at Snape for the Alde and Ore Futures project and Lowestoft on the regional hub for NetGain I would be happy to act as a representative for the Trust but only with the full support of the Trust".*

but received no response.

I think that to criticise the project when the trust chose not to be involved until very recently is unreasonable and unfair. The NetGain team is acting under instruction and guidance from a number of government and environmental agencies to produce a network of Marine Conservation Zones that form part of the UK response to a European directive. To answer NO to the feedback form question "For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?" would appear to suggest that the Trust intends to continue to refuse to contribute to the project on behalf of the community and to take no action to protect their assets and income which are potentially under threat depending on the areas to be designated and the management controls to be applied to those areas.

NetGain will be represented at the Alde and Ore EPP meeting in Sudbourne tomorrow and I hope that the Trust will be able to meet the team to try to determine what involvement the Trust should have.

Regards

Roger

---

**From:** Orford Town Hall [<mailto:orfordtownhall@tiscali.co.uk>]

**Sent:** 23 March 2011 11:27

**To:** Anne Macro; Anna Cornford; David Goldin; Derek Forbes; Hugh Pilkington; Joy Castle; Margaret Green; Mary Iliff; Michael J Pearce; Richard Mallett; Richard Roberts

**Cc:** Roger Hipwell

**Subject:** NetGain feedback

Dear all,

Please find attached the Chairman's draft response to the NetGain document, completed at the Riverside meeting. Please let me know if you have a any further comments.

Thanks,

Rosie



## Feedback following 3<sup>rd</sup> Iteration submission to SAP – March 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

Please use the following form to record this feedback.

Name: Dr David Goldin.....  
Sector represented: New Orford Town Trust .....  
Regional Hub: NG1.....

Please explain briefly how the feedback you are presenting was collected:

The 3<sup>rd</sup> Iteration was read by some of our 12 members and on discussion the unanimous feeling of the Trust was that the document was so full of jargon and modern gobbledegook that it was effectively unreadable. Where was the summary in simple English? It is a pity that with so many academic advisors on the board more clarity could not have been incorporated. ....

.....  
.....

When clarification was sought to enable us to lead a sensible discussion and possible allay fears, it seems the universal answer is that it is early days and views and further clarification is awaited

The New Orford Town Trust's interest is that

1) The Trust owns the river bed by Royal Charter.

2) The Trust owns and operates about 200 moorings on the river for local fishermen and recreational activities and this provides a substantial source of income for our community.

3) A significant number of local people earn their livings in relation to the River Ore.

Please indicate how many people you have been able to discuss this feedback with: **17**. .....

For the next iteration is there any additional support that you would like to help collate opinion and views from your sector?

No. ....  
 .....

Site ID	Level of support for site, <u>score from 1 to 4</u> : 1 - strongly against; 2 - against; 3 - support it; 4 - strongly support	Suggested adjustments to improve conservation benefits, reduce impact or improve potential management	Expected impacts for your sector if current activities are restricted	Any other comments


When complete, please return to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or to:  
Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG

## Net Gain

Feedback from stakeholders on the draft final recommendations as submitted to the SAP





## Feedback following submission of Draft Final Recommendations report to SAP – June 2011

Name: **Antony Viera** Regional Hub:

Sector represented: **French Fishing Interests**

Please explain briefly how the feedback you are presenting was collected: **during meeting at the CRPMEM NPdC/P and discussion.**

Please indicate how many people you have been able to discuss this feedback with: **~25**

Before explaining our level of support, we would like to express our disappointment about our level of implication in the Net Gain process. Since the January meeting in South Shield, we were completely off the project, receiving the invitation for the meeting of March and May only a few days before the date. Moreover, we received reports for the March meetings at the end of May! As a stakeholder in Net Gain, we have not been able to fully participate in this process and to present the main issues of the French fleet fisheries and we really suffer from a lack of transparency in the process.

About the draft final recommendation report, we did some comments (via the feedback form following 3rd Iteration submission to SAP and by mail), concerning the gentlemen's agreement in front of Grimsby (Silver Pit) but there is absolutely no mention of it in the draft final recommendation report. It actually seems there is no mention of the international fisheries fleet at all. We would like to underline that in the context of the Fisheries Common Policy we do have fishing rights in the UK water (6-12 nm and beyond).

Three remarks about the process in general:

- The lack of time, mentioned several times in the draft final recommendation report;
- The overlapping of the dMCZ network to the European Natura 2000 Network and the increasing competition for space with marine aggregates and windfarms. As a consequence, the maritime space is highly divided, especially in the eastern part of the Channel and in the North Sea. In a context of Maritime Spatial Planning in the EU, a communication from the commission to the European parliament, the council, the European economic and social committee and the committee of the regions (Brussels, 17 December 2010, COM(2010) 771) states that "the catching sector needs flexible access in order to respond to changes in distribution patterns of fish stocks. [...] The need to ensure coherence in spatial plans between sea areas becomes apparent in the context of fisheries management, because of the mobility of the resource and because such decisions are taken at EU level in the CFP". The actual division of the seas, in the North Sea, does not respect this engagement.
- The unpredictable nature of fishermen who will be displaced from traditional fishing grounds and will re-locate in areas that are already exploited by other fishers. The increase in fishing density on fewer and smaller areas may cause unacceptable and unsustainable damages, thereby depleting further the economic base of our precious fishing sectors.

Moreover we would like to underline that, in the concept of the sustainable development, environmental, economic and social sustainability are equally important and that it is not true that, like written in the report, "ecological is central, and that socio-economics are secondary". Fishing industry is already strongly ruled from a European point of view and the fishing effort and TAC and quota are constantly decreasing.

Finally we still don't know who is the person in charge of the Impact Assessment in the Net Gain project and what kind of data he needs!

Site	Level of support	Implications if site is designated	Any other comments
6	1 (strongly against)	<p>Between 10 and 20 exclusive trawlers (mainly Nord-Pas de Calais but from Haute Normandie too) use to fish on site 6, north west part of site 9 and south part of site 12 and between 20 and 40 exclusive trawlers and non exclusive trawlers (from Boulogne-sur-Mer) use to fish on site 7.</p> <p>Even though the presence of the French fleet in this part of the North Sea is lower than in the Eastern part of the Channel and unpredictable, these areas are very important for French fishermen. They are completely part of their fishing areas, in function of their fishing strategies.</p> <p>There are several factors influencing, in a quite complex way, the fishing strategies: the attribution of quota (whiting, mackerel) in ICES areas IV and VII and the presence/absence of species not under quota with high value (as red mullet or squid) in the Channel may set these areas as top priority for our fleet (for example, if there is no whiting quota in VIId and a high quota in IV).</p> <p>Moreover, the fleet fishing in these areas is the same fleet fishing in the Balanced Seas area. So this fleet is already very impacted by the MCZ project.</p>	<p>This site is concerned by a “gentlemen’s” or “goodwill” agreement made in the Marine Fisheries Agency headquarters, 3-8 Whitehall Place, London, on Tuesday 31 October 2006. This arrangement is applied to the area known as the ‘Silver Pit’, called Zone ‘C’, and defined by the following coordinates:</p> <ul style="list-style-type: none"> <li>i. 53° 35 N 00° 41 E</li> <li>ii. 53° 24 50 N 00° 37 00 E</li> <li>iii. 53° 23 60 N 00° 42 00 E</li> <li>iv. 53° 26 00 N 00° 40 00 E</li> <li>v. 53° 31 00 N 00° 42 20 E</li> <li>vi. 53° 34 00 N 00° 45 00 E</li> <li>vii. 53° 35 00 N 00° 45 20 E</li> </ul> <p>The area inside the box defined by these coordinates is an exclusive trawling zone (Site 6). Same thing about the area extending north of a line extending from the 12 mile limit, eastwards without limit, at 53° 54’ North (Site 12).</p>
9	1 (strongly against)		
12	1 (strongly against)		
7	1 (strongly against)		
1b	1 (strongly against)	Between 10 and 20 exclusive trawlers, mainly from Boulogne-sur-Mer use to fish in this area.	

Feedback on Draft Final Recommendations; The Crown Estate

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Alde Ore Estuary				1 inactive telecoms cable			Wildfowling				
				2 active power cables			Outfalls		x		
				2 active unknown cables			Coastal protection				
Boulby Zone							Cleveland Potash disposal			x	Assumption there will be no additional marine license requirements on Potash Mine due to MCZ designation.
							Boulby Mine				
Castle Ground				2 inactive telecoms cables			Outfalls	x			
Compass Rose	R3 Z3 Forewind cable route possibly overlays this area	A high value aggregates region worth £6.4million per km <sup>2</sup> overlaps with the pMCZ		1 inactive telecoms cable		1 active gas pipeline is approximately 0.5 km east of the pMCZ				x	Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.
				2 active telecoms cables							
Coquet To St Mary's Zone	Blyth Offshore Windfarm is within the pMCZ, Tenant Blyth Offshore Wind Ltd, operating		pMCZ is within a future interest area for nearshore wave projects	2 active windfarm cables			Coquet is disposal site				Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.
	Blyth Demonstration Site is within the pMCZ, tenant NAREC, agreement for lease			1 active unknown cable			Moorings			x	
							Wildfowling				
							Coastal protection works				
							Outfalls				

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Cromer Shoal Chalk Beds	Sheringham Shoal Wind Farm cable		pMCZ is within a future interest area for nearshore wave projects	6 inactive telecoms cables			Coastal protection works		x		Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.
	Dudgeon Wind Farm cable					Outfalls					
Damnation Alley / Westermost Rough	Borders Hornsea Round 3 Zone and overlaps cable route. Tenant Mainstream and Siemens	A high value aggregates region worth £8.675million per km <sup>2</sup> overlaps with the pMCZ	pMCZ is within a future interest area for nearshore wave projects		Rough Gas Storage Site is within the pMCZ. Tenant Centrica, current lease	13 active gas pipelines			x		Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation. Accept however concern over recent NE/JNCC Guidance stated a buffer of 2-4km (preferably 4km) is required to avoid additional mitigation requirements on licensed aggregate areas.
	Westermost Rough Offshore Windfarm is approximately 1.5 km from the pMCZ, tenant Westermost Rough Limited, agreement for lease.	Humber Estuary licenced dredging area is approximately 1 km south of the pMCZ. Tenant British Dredging Ltd				1 active unknown pipeline					
						1 active chemical pipeline					
						1 inactive gas pipeline					
Farnes East				3 inactive telecoms cables				x			

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Fishermen's Friend	Borders East Anglia One Zone 5 Cable route	A high value aggregates region worth £3.4million overlaps with the pMCZ		3 inactive telecoms cables				x			Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation. Accept however concern over recent NE/JNCC Guidance stated a buffer of 2-4km (preferably 4km) is required to avoid additional mitigation requirements on licensed aggregate areas.
		North Inner Gabbard dredging application area is within 1.5 km of the pMCZ. Tenant is Britannia Aggregates Ltd		1 active telecoms cable							
		Shipwash dredging application area is within 1.5 km of the pMCZ. Tenant is CEMEX UK Marine Ltd									
Fulmar				1 active telecoms cable		3 active chemical pipelines		x			
				1 inactive telecoms cable		6 active gas pipelines					
						10 active oil pipelines					
						3 inactive oil pipelines					
						1 active other fluid pipeline					
						1 active unknown pipeline					

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Holderness Inshore	Westermost Rough Offshore Windfarm is approximately 2 km from the pMCZ, Tenant Westermost Rough Limited, Agreement for lease. The windfarm cable overlays this MCZ		pMCZ is within a future interest area for nearshore wave projects	1 active unknown cable		7 active gas pipelines	Coastal protection				Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.
	Humber Gateway is approximately 2 km from the pMCZ, Tenant Humber Wind Limited, Agreement for lease					1 inactive gas pipeline	Outfalls		x		
	Hornsea Round 3 Zone cable route Tenant Mainstream and Siemens										
Lincs Belt	Hornsea Round 3 Zone cable route. Tenant Mainstream and Siemens					4 active methanol pipelines	Wildfowling				Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.
						3 active gas pipelines	Coastal protection			x	
						1 active chemical pipeline					
Markham's Triangle / Hole	Co-Located with Hornsea Round 3 Zone. Tenants Mainstream and Siemens.			1 inactive telecoms cable						x	Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation.

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Rock Unique				1 inactive telecoms cable				x			
Silver Pit	Triton Knoll Offshore Windfarm overlaps with the pMCZ, Tenant Triton Knoll Wind Farm Limited, agreement for lease.	A high value aggregates region worth £8.675million per km <sup>2</sup> overlaps with the pMCZ	pMCZ is within a future interest area for nearshore wave projects	1 active power cable		2 active methanol pipelines		x			Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation. Accept however concern over recent NE/JNCC Guidance stated a buffer of 2-4km (preferably 4km) is required to avoid additional mitigation requirements on licensed aggregate areas.
		Area 106 East dredging and prospecting licence areas border the pMCZ. Tenant Hanson Aggregates Marine Ltd				6 active gas pipelines					
	Hornsea Round 3 Zone cable route. Tenant Mainstream and Siemens	Humber Estuary licenced dredging area runs along the boundary of the pMCZ				3 active chemical pipelines					
Swallow Sand			pMCZ is within a future interest area for offshore wave projects	3 inactive telecoms cables		1 active oil pipeline		x			
				1 proposed power cable		2 active gas pipelines					

pMCZ	Wind	Aggregates	Wave	Cables	CCS/Gas	Pipelines	TCE Leases in Foreshore	Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Wash Approach MCZ	Race Bank Offshore Windfarm overlaps with the pMCZ. Tenant Centrica (RBW) Ltd, agreement for lease	A high value aggregates region worth £6.4million per km <sup>2</sup> overlaps with the pMCZ				3 active gas pipelines	Dudgeon disposal				Assumption that there will be no additional EIA requirements on renewables project due to MCZ designation. Accept however concern over recent NE/JNCC Guidance stated a buffer of 2-4km (preferably 4km) is required to avoid additional mitigation requirements on licensed aggregate areas.
	Sheringham Shoal Offshore Windfarm overlaps with the pMCZ. Tenant Scira Offshore Energy Ltd, currently under construction	Outer Dowsing dredging licence area overlaps with the pMCZ. Tenant Westminster Gravels Ltd				2 active methanol pipelines					
	Docking Shoal Offshore Windfarm is adjacent to the pMCZ. Tenant Centrica (DSW) Ltd, agreement for lease	South Inner Dowsing licenced dredging area is within 1 km of the pMCZ, Tenant British Dredging Ltd									
	3 proposed windfarm cables										



Reference area		Support	Accept	Non-Support	Reasoning/Dependencies/Assumptions
Cromer Shoal	RA EE1			x	Too close to pipelines and cables
Cley Bird Reserve	RA LW1a	x			
Cley Bird Reserve	RA LW1b	x			
Wash Approach	RA LW2	x			
Titchwell's Bird Reserve	RA LW3a	x			
Titchwell's Bird Reserve	RA LW3b	x			
Blakeney Point	RA LW4	x			
Inner Outer Dogs Head Sandbanks	RA LW5	?	?	?	
	RA NE1	x			
	RA NE2	?	?	?	
Farnes East	RA NE3			x	Overlays Newbiggin to Maastrand Cable no.2
Compass Rose	RA YH1	x			
Kirk's Own	RA YH2	?	?	?	



## Feedback following submission of Draft Final Recommendations report to SAP – June 2011

Name: **Helen Quayle** Regional Hub: **Representing the North East, Yorkshire & Humber, Lincolnshire & The Wash and East England hubs**

Sector represented: **RSPB**

Please explain briefly how the feedback you are presenting was collected: **Internally within the RSPB; all 4 hub reps, Marine Conservation Officer, coastal reserve staff and the national marine team. Externally with other conservation NGOs.**

Please indicate how many people you have been able to discuss this feedback with: **10+**

### ***Specific feedback on the draft report***

#### **Re Section 7: 'Key concerns of stakeholders'**

Section 7 of the Draft Final Recommendations Submission to the Science Advisory Panel describes three stakeholder concerns including increased management measures over time, lack of site ownership and closure of the MCZ projects but fails to address key environmental concerns, which have been expressed (with explicit requests that they be recorded in many instances), throughout the development of the draft network. These key concerns include:

- In accordance with the ENG criteria MCZ identification and designation should be based on the best available scientific evidence.
- Ecological datasets have been provided but there has been limited availability/use of ecological datasets at the regional hub meetings.
- The proposed MCZs have largely been selected on the basis of minimising socio-economic impacts rather than their ecological value.
- Selection on this basis is unlikely to provide an ecologically coherent network and in fact there is little overlap between AAEI and the draft MCZs.
- In such a network there is a potential risk that damaging activities could be displaced from MCZs into important areas of biodiversity.

#### ***Not included***

***The Draft Final Recommendations Submission to the Science Advisory Panel does not include any commentary on the decisions made regarding the loss of sites including NG1. This should be included and the objection from RSPB which was raised at the meetings recorded.***

The RSPB notes Annex 1 of the recent SAP advice regarding bringing forward cases where mobile species such as seabirds could be included as interest features of MCZs. This helpful guidance is welcomed, not least because at the North East regional hub meeting in January 2011 the RSPB was informed in no uncertain terms by Net Gain and Natural England that seabirds **could not** be made interest features of MCZs.

Consequently the RSPB is urgently considering which sites in the network such a case for seabirds being included in the interest features of this can be made for.

Site	Level of support	Implications if site is designated	Any other comments
NG1	4 (strongly support) – for the original site	Designation of this site could have had a positive impact on the environmental sector by supporting healthy marine ecosystem and seabird populations. Loss of this site represents a missed opportunity to protect a valuable and important stretch of coastline and ecologically valuable seas.	<p>At the May East England hub the RSPB rep raised the SAP advice regarding the reinstatement of site NG1. This site had already been further reduced in size at the March meetings, prior to the SAP advice being available, and at the May hubs the SAP advice to reinstate the site was not heeded. There has been no opportunity to revisit NG1 to try to optimise ecological benefits as suggested by the SAP and raised by the RSPB in during the May meeting.</p> <p>It is concerning that the reduction of “surplus” BSH area from the network has not always been targeted to the areas of lower ecological value to allow areas of greater value to remain in the network. For example NG1 underwent cutting to reduce “surplus” subtidal sand. One BSH and six FOCI habitats listed for NG1 were lost as this site was split into smaller less ecologically viable sites. “Surplus” subtidal sand was also reduced at the less ecologically important NG16 and NG17 but not at a scale which allowed the retention of more valuable areas like NG1. The effects on the network as a whole and regional biogeography have not been considered, and instead many areas were lost or reduced based on socio-economic considerations.</p> <p>The two small sites that have gone forward instead of NG1 are not ecologically equivalent. Site NG1 should have been retained in its entirety for the mosaic of broad-scale habitats, and its overlap with part of the Outer Thames SPA, an area of considerable pelagic ecological importance. The RSPB does not support the loss of this site from the network.</p>
NG1b	RSPB is not against this site but would prefer to see a more ecologically valuable option put forward.	This site is too small and does not encompass core areas for foraging seabirds or areas of high pelagic diversity.	The SAP stated that it was not necessary for this site to be reduced in size to allow for renewables cables. RSPB supported this position in the hub but the SAP advice on this site was not referred to by Net Gain during the meeting and the site was reduced in size. This option of co-location was not explored. RSPB do not support the further reduction in size of this site.
NG1c	RSPB is not against this site but would prefer to see a more ecologically valuable option put forward.	Despite being within the range of a number of colonies it is unlikely to deliver significant benefits to seabirds due to its small size.	The reduction of this site (to cover just the estuary area) further limits its ecological value. It is not clear why conservation objectives have not been set for all features present (of the 10 BSH and FOCI listed as features not proposed for designation reasons are only provided for two in the draft report).

Site	Level of support	Implications if site is designated	Any other comments
NG2	3/4 (support / strongly support)		<p>As this is the only remaining MCZ of reasonable size on the whole of the coast stretching from The Wash down to Suffolk, the RSPB supports its retention in the network but is disappointed that the opportunity to extend the site to cover an area of considerable importance for breeding seabirds and of high pelagic productivity was not taken and that the site does not protect all habitats within its boundary.</p> <p>In the draft report the discussions for this site on p51 state that “Net Gain reminded the group that it is not necessary to designate every feature within a site and features not designated within NG2 were covered elsewhere in the network”. This approach does not take into consideration if features are of local or regional interest and what pressures might be affecting the features here and elsewhere in the network. It also requires the network as a whole to be considered which has not been possible during the hub meetings. The littoral chalk should be included within the site boundary.</p>
NG5	4 (strongly support)		<p>RSPB supported the SAP advice provided in their response to Net Gain on the 3rd Iteration which stated that NG5 and NG8 were separated only to avoid the Humber shipping lane and as the shipping here will not affect the seabed there are no ecological reasons for two separate sites. The SAP has reiterated this position in their recent feedback on their response to the Draft Final Recommendations.</p>
NG6	4 (strongly support)	This is one of the most ecologically diverse sites within the network.	<p>As has been recorded in the draft report, this site is subject to a lot of activity. This site should go through with conservation objectives set to “recovery” as maintenance of the status quo risks damage to the features of interest.</p>
NG8	4 (strongly support) - with little tern listed as a feature	If designated with conservation objectives set which would benefit little terns this site could have positive implications.	<p>RSPB supported the SAP advice provided in their response to Net Gain on the 3rd Iteration which stated that NG5 and NG8 were separated only to avoid the Humber shipping lane and as the shipping here will not affect the seabed there are no ecological reasons for two separate sites. The SAP has reiterated this position in their recent feedback on their response to the Draft Final Recommendations.</p> <p>NG8 supports good invertebrate communities and some key nursery and spawning areas. The full impacts of the shellfisheries here must be fully considered in the conservation objective.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG9	3 (support)		<p>In previous feedback we have raised concerns that there has been limited availability/use of ecological datasets at the regional hub meetings and as a result there is little overlap between AAEL and the draft MCZs. In some cases there is a risk that damaging activities could be displaced from MCZs selected to minimise impacts on socioeconomic interests, into areas of greater importance for marine life that were not included within the boundaries.</p> <p>Site NG9 was chosen solely on the basis of socio-economics to meet BSH targets. Boundaries were selected primarily to avoid areas which are important fishing and allocated for potential windfarm development. Consequently the site is of lower ecological importance than seas in the Flamborough-Helogland Front just to the north.</p> <p>In their feedback on the 3rd Iteration and Draft Final Recommendations, the SAP suggested that eliminating the narrow gap between sites NG8 and NG9 would make the management and protection more coherent recommending that that the feasibility of co-location should be investigated. Unfortunately this advice was not raised by Net Gain and co-location was not explored in the final meetings. The joining of these sites could help to produce a more coherent network for site management with possible ecological and overall socio-economic benefits, through joint, sustainable use of the seabed.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG10	4 (strongly support) – with a seaward extension	<p>Many of the seabirds foraging here travel from the breeding colony at Flamborough Head (which includes RSPB reserve Bempton Cliffs). A decline in the seabird population at Bempton Cliffs could result in reduced visitor numbers which would affect both RSPB and the local economy. Several local businesses are geared to take advantage of visitors to the reserve including B&amp;Bs, caterers and seabird cruises 1. One B&amp;B stated that 70% of its visitors were bird watchers.</p> <p>The final report concluded that in 2009 an estimated income of over three quarters of a million pounds coming into the local area was attributable directly to seabirds. This income supports over 5% of all employed people in the Bempton Parish Council area not including the 11 staff employed at the reserve.</p> <p>Extending the site seawards and including seabirds as a feature with conservation objectives could help to protect all these social and/or economic interests, as well as the ecological value of the site.</p> <p>Additionally the cliffs between Filey and Scarborough hold around 10,000 pairs of breeding seabirds, which are currently afforded no protection and which may be expected to forage in the offshore areas.</p>	<p>The RSPB would like to see this site extended seawards to include seabird foraging areas. Foraging seabirds are an indicator of productive areas of sea and their presence could have been used to identify areas for MCZs. The RSPB is disappointed that seabirds have not been included in the network and that these species will receive no direct benefits from MCZ designation. Had the presence of seabirds been used to inform the locations of draft MCZs, even if conservation objectives and management measures were not set for seabirds, these areas would have been captured in the network and there would be an increased likelihood that seabirds could benefit indirectly from MCZ protection.</p>
NG11	3 (support)		Includes some valuable intertidal habitats and fauna.
NG12	RSPB is not against this site but can only offer a low level of support.		<p>In previous feedback we have raised concerns that there has been limited availability/use of ecological datasets at the regional hub meetings and as a result there is little overlap between AAEI and the draft MCZs. In some cases there is a risk that damaging activities could be displaced from MCZs selected to minimise impacts on socioeconomic interests, into areas of greater importance for marine life that were not included within the boundaries.</p> <p>This site has been selected outside areas with a high level of socioeconomic interest and consequently failed incorporate any of the Flamborough-Helgoland frontal area to the south which is of much higher ecological value.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG13	4 (strongly support)	RSPB is responsible for the management of Coquet Island Special Protection Area and Site of Special Scientific Interest. Protection of the seabed habitat and associated species could deliver benefits for the SPA/SSSI interest features through improved foraging opportunities <i>if</i> appropriate conservation objectives and management measures are put in place.	Approximately 90% of the UK's breeding population of roseate terns nest on Coquet Island. This threatened, rare, nationally and regionally important bird could benefit greatly from inclusion as a feature of the MCZ with conservation objectives, as could the other species comprising the nationally important seabird assemblage breeding here. Given the significance of the birds here, particularly roseate terns, we are considering this as one site for which we may pursue a case for seabirds in accordance with the advice in Annex 1 of the SAP feedback.
NG14	4 (strongly support)	This MCZ lies within the foraging range of a number of the Farne Island SPA's features, including puffin and guillemot. The area is also of importance for wintering birds, although the formerly included site immediately to the south (NG14S) held much higher densities of wintering birds. Protecting this area could support the conservation of the Farne Islands, and in turn maintain the important visitor economy at Seahouses <i>if</i> appropriate conservation objectives and management measures are put in place.	The MCZ should not have been reduced in the final hubs, as an area of high pelagic biodiversity/AAEI has been lost as a consequence. We note and fully support the SAP's recommendation to reinstate NG14S in order to meet the minimum target for the subtidal mud BSH – this would also include an area of high pelagic AAEI in the Net Gain network, the general absence of which from the proposed network so far is notable.



Dear Joanna,

The North Sea Wildlife Trusts welcome the opportunity to submit feedback to Net Gain regarding the draft final MCZ recommendations. As always we submit our feedback in a positive manner in the hope it can be used to assist the development of the MCZ network recommendations. We recognise that any change to site boundaries/location is now restricted, however as there continues to be areas of the network which do not meet ENG requirements or fully encompass the AAEl guidelines we continue to provide the project with a full feedback response whilst recognising the restrictions the project faces, i.e. in terms of time.

**dMCZ site feedback**

NG site	Recommendation
<p>1b Fishermen's Friend</p> <p>1c Alde Ore</p>	<p>We continue to support the initial NG1 site configuration; the initial recommendation was identified for seabed protection and encompassed AAEl, making it of identifiable high benthic and pelagic ecological importance. We recommend Net Gain continue to reference the initial dMCZ recommendation as a potential site option within their final recommendations and log consensus for each site.</p> <p>1c – We remain concerned that only Habitat FOCI and Smelt are recorded as features for this site. In order to fully protect the site an ecosystem approach to designation is required considering all broadscale habitat features as well as FOCI, as such we recommend the inclusion of the underlying broadscale habitat is included within the site as a feature (the ipdf appears to show this as Subtidal Mud).</p> <p>Orfordness GCR is referenced within the site features, however the following hub discussions suggest the GCR feature may not be included, clarity is required.</p>
<p>2 Cromer Shoal Chalk Beds</p>	<p>We are pleased to see the inclusion of this site within the network as it is of high national and European ecological importance, potentially being Europe's largest subtidal chalk reef, larger than Flamborough.</p> <p>We are however disappointed to see the amendments made to the site boundaries, shifting the boundary offshore by 200ms. This level of detail is not evident within the report at the map scale given. This shift appears to have crept into the process, post the ability to amend site boundaries with no other justification other than one stakeholder's rejection of the original boundary based around sea defence works. By removing this section of the site no consideration is being given to the wider ecosystem implications this creates. By omitting large areas of Littoral Chalk from the site we omit essentially a section of overall chalk feature, the Littoral Chalk (found within the 200metre omission) will form the initial 'shallower' chalk feature which then runs into the Subtidal Chalk, creating a large ecologically productive Chalk feature. By removing the first 200ms of this site essentially an element of the core feature has been removed. Given both the rarity of intertidal and subtidal chalk (as well as the seaweed features referenced by the SAP 5.5) we recommend the entire feature is encompassed within this site and the initial boundary re-instated.</p> <p>Regarding sea defence works we recommend a consistent approach is taken across the Net Gain region and that sites are not omitted based on the presence of these structures. NG10 notes the presence of sea defences and the potential these may have to put areas of the site into unfavourable condition, this has been noted and the features included.</p>

**North Sea Wildlife Trusts**

Northumberland  
 Durham  
 Tees Valley  
 Yorkshire  
 Lincolnshire  
 Norfolk  
 Suffolk

Sheffield  
 Nottinghamshire  
 Derbyshire  
 Leicestershire and Rutland  
 BCNP (Bedfordshire,  
 Cambridgeshire,  
 Northamptonshire and  
 Peterborough)





**North Sea Wildlife Trusts**

Northumberland  
 Durham  
 Tees Valley  
 Yorkshire  
 Lincolnshire  
 Norfolk  
 Suffolk

Sheffield  
 Nottinghamshire  
 Derbyshire  
 Leicestershire and Rutland  
 BCNP (Bedfordshire,  
 Cambridgeshire,  
 Northamptonshire and  
 Peterborough)

NG site	Recommendation
NG4 Wash Approach	<p>We welcome the inclusion of this site within the network, although query the decision made to exclude Ross Worm, <i>Sabellaria spinulosa</i> from recommendation as a feature due to it being included within the Inner Dowsing-North Ridge, Race Bank SAC. We wish to clarify that although protected within the SAC it is not also protected in this site as a result and so should be considered as a feature for NG4. We also note that the site boundary was again altered during the May hubs to accommodate socio-economic activities, e.g. possible impacts from adjacent extraction sites. If this was likely to cause an impact to the features of the site it would have been highlighted during the vulnerability assessment and the appropriate conservation objective identified in order to guide future management of the site. 'Possible impacts' (page 65) should not at this stage have been used to alter site boundaries and reduce the site further in size. During the May meetings, we also note there was no potential of amending or moving site boundaries to accommodate ecological features.</p>
NG5 Lincs Belt	<p>We welcome the inclusion of this site but query the exclusions of the broadscale habitats and FOCI omitted as site features. We note that Littoral Chalk has 3 replicates within the Net Gain region; the ENG specifies 3-5 replicates for FOCI, as such we encourage the inclusion of this FOCI as a feature of this dMCZ. We also query the comments given regarding the 'feature not being a good enough example' (page 73), this process allows for the inclusion of all features whatever condition and as such should not rule features out unless perhaps the other potential examples within the Net Gain region are of much higher ecological significance, evidence for this should be recorded in the site narrative if this is indeed the case. See NG8 for comments regarding gap between NG5 and NG8.</p>
NG6 Silver Pit	<p>We welcome the inclusion of this site and are pleased the AAEI table given reflects the importance of this site as an ecological feature. We note the entirety of the feature does not appear in site NG6 and crosses over into NG9 also. We urge that this information is represented clearly within the report and that NG6 identifies the rest of the Inner Silver Pit geological feature of that site. To date the Yorkshire and Humber NG9 hub has not considered the Inner Silver Pit as a site feature as the assumption was made that the feature did not occur beyond NG6. As this discussion has not been noted within the Yorkshire and Humber hub we would advise this is raised at the large group meeting with the intention of listing the geological feature Inner Silver Pit within NG9.</p> <p>There are currently only 2 replicates of FOCI Ocean Quahog across the dMCZ network, this FOCI has been identified as occurring within this site but not included as a site feature. This FOCI should be considered as an additional feature for this site to ensure the network recommendations meet the minimum ENG FOCI target of 3 replicates. There appears to be no objection for including this feature other than stakeholders expecting it to be included within other dMCZs. We welcome the comments raised by JNCC at the StAP meeting on 4<sup>th</sup> June and recommend that Net Gain adopt the recommendation for the precautionary principle in relation to Ross Worm and put forward a draft recovery conservation objective for this feature in place of the previous maintain recommendation.</p>
NG7 Markham's Triangle	<p>We welcome the inclusion of this site and the incorporation of some aspect of the Outer Silver Pit 0.00041km<sup>2</sup> we encourage that reference is given to this within the site narrative and that reference is given to the connectivity of the site with the Dutch Cleaver Bank MPA. We would recommend the inclusion of a map to highlight this clearly. A small central section of this site currently remains omitted as a feature of this site, unless evidence is directly available stating the exact location of the broadscale habitat we recommend it is included within the site proposals as it is possible (if based on modelled data) that the broadscale habitat may not occur within the specific area suggested.</p>



**North Sea Wildlife Trusts**

Northumberland  
 Durham  
 Tees Valley  
 Yorkshire  
 Lincolnshire  
 Norfolk  
 Suffolk

Sheffield  
 Nottinghamshire  
 Derbyshire  
 Leicestershire and Rutland  
 BCNP (Bedfordshire,  
 Cambridgeshire,  
 Northamptonshire and  
 Peterborough)

NG site	Recommendation
<p>NG8 Holderness Inshore</p>	<p>We welcome the inclusion of this site within the Net Gain network. It is a good example of a range of broadscale habitats, notably likely due to the existing trawling restrictions within the area. Seabed habitat is varied, with a wide variety of life associated with it. We note and welcome peat and clay exposures as a feature of this site although recommend the site includes the intertidal area as this is primarily the main region for peat and clay within exposures within this locality, current site boundaries do not capture a great deal of this feature, with reference given to only one data point. There also appears to be a 'large white space' within the southern section of the site, this from the ipdf is coarse sediment there is no explanation for the removal of this section of the feature and as such an explanation should be provided or the broadscale habitat replaced as a feature. Having studied the previous iterations this section of site is included and at no point was this area of broadscale habitat removed by stakeholders, if this area has been removed due to REC data highlighting a different broadscale habitat to the original coarse sediment then a discussion should be had regarding its inclusion.</p> <p>Regarding the AAEI tables, like NG2 this site appears low in productivity as the majority of narrative focuses on pelagic ecological features. Seasearch 2010 dives found a range of broadscale habitats here, 9 species of crab within one dive site alone. Net Gain need to find a manner to represent this data within their final submission.</p> <p>The southern boundary of this site needs re-visiting to encompass the Binks GCR feature. The Binks GCR is the seaward extension of Spurn Point, hence why within the ENG reference is given to Spurn Point as the GCR for simplicity. Throughout Yorkshire hub meetings stakeholders have been keen to see the inclusion of the Binks within the dMCZ, discussions have taken place regarding its inclusion as a reference area although have not progressed, this should not be confused with its general inclusion within NG8 dMCZ. Following lack of detail regarding the Binks location the southern boundary of NG8 has been 'trimmed' to the NEIFCA no trawl boundary, having now identified the GIS location of the Binks feature this boundary line has resulted in the GCR feature lying outside of the dMCZ. We strongly urge Net Gain to re-position the southern boundary of this site in light of the new information available, as 'best available evidence' this will not change conservation objectives for the site as the Binks is already listed as a site feature. Re-adjusting the boundary will also continue to retain the gap requested by some stakeholders within hub meetings and so should not alter consensus, we do however note that we are still uncomfortable regarding the gap between NG5 and 8 and can see now ecological or socio-economic reason for this, particularly as conservation objectives for this site would be unlikely to restrict any activity occurring here as the key activities reference, i.e. shipping have no bearing on the seabed habitat identified as the key feature (SAP report 5.1)</p>
<p>NG9 Damnation Alley</p>	<p>We welcome the inclusion of this site within the network and are pleased to see the REC data has been used to clarify broadscale habitat type. We strongly support the identification of mixed sediment as a site feature alongside coarse sediment and request that Net Gain captures the reasoning for the addition of this feature within the site narrative. We feel this is of particular importance as the REC data only covers half of the site, it is likely if mixed sediment has been identified within the southern region of the site that it may well also be evident within the northern region also, hence the need for a clear narrative regarding stakeholder willingness to adopt mixed sediment as a feature so as it can be adopted across the site it needed.</p> <p>Regarding SAP comments 2.9 Net Gain need to make it clear the REC data has been used to identify the features of this site.</p>



North Sea Wildlife Trusts

Northumberland  
Durham  
Tees Valley  
Yorkshire  
Lincolnshire  
Norfolk  
Suffolk

Sheffield  
Nottinghamshire  
Derbyshire  
Leicestershire and Rutland  
BCNP (Bedfordshire,  
Cambridgeshire,  
Northamptonshire and  
Peterborough)

NG site	Recommendation
NG10 Castle Ground	<p>We welcome this site as the largest intertidal site encompassing a range of intertidal broadscale habitats. In order to consider the full intertidal ecosystem we urge that the Littoral Chalk community FOCI is also considered as a site feature.</p> <p>We recommend that the final recommendations also capture the discussions had regarding zonation of this site within the hub meetings, particular in reference to the sea defence structures and acceptance of the site being put forward knowing that these structures may result in areas of the site being in unfavourable condition.</p>
NG11 Boulby Zone	<p>We welcome of the inclusion of this site within the network but are still unclear as to why the intertidal features of this site have not been included as features no explanation is given regarding this. Both the northern and southern boundaries of this site meet with the coastline, however the centre of the site does not logic suggests in order for completeness and to capture the maximum mosaic of habitats that the intertidal habitats within the central coastal location should be captured in the site recommendation.</p>
NG12 Compass Rose	<p>We welcome the inclusion of this site within the network and suggest Net Gain capture the full hub discussion within its narrative, i.e. the reason the site is kept large but only the circalittoral rock is a feature is to ensure that should the identified broadscale habitat not be present where currently identified following low confidence in the underlying data that the site can continue to capture rock elsewhere within the site to ensure this ENG target is met.</p>
NG13 Coquet to St Marys	<p>We welcome the inclusion of this site within the network as it is of high benthic and pelagic importance, however the current Net Gain descriptions do not reflect this and we recommend this is amended and developed prior to the final network submission.</p>
NG13a Aln Estuary	<p>We welcome the inclusion of this site within the network however note the designating features are incredibly patchy (being FOCI features), we recommend the instigation of the underlying broadscale habitat to rectify this and provide ecosystem protection across the entire dMCZ.</p>
NG14 Farnes East	<p>We are pleased to see the inclusion of this site within the network but continue to be disappointed by the removal of NG14S for Subtidal Mud. This site is high in pelagic ecological features and now as a result of revisions in the gap analysis the dMCZ network does not meet the adequacy targets for Subtidal Mud, as such we suggest the re-instatement of this site as supported by the SAP comment 3.1.</p> <p>We suggest in this instance it would be better to put this site forward with low stakeholder support than not at all, so as to meet the ENG targets and follow the MCZ process guidance.</p>
NG15 Rock Unique	<p>We welcome the inclusion of this site within the network and recommend that Net Gain reflect the unique nature of this habitat within the narrative for this site.</p>
NG16 Swallow Sands	<p>We welcome the inclusion of these sites within the network but still remain concerned that SAP advice at iteration 3 was ignored and that discussions regarding additional sites within this hub area were never explored fully.</p> <p>We welcome the comments raised by JNCC at the StAP meeting on 4<sup>th</sup> June and recommend that Net Gain adopt the recommendation for the precautionary principle in relation to these sites and put forward a draft recovery conservation objective for this site in place of the previous maintain recommendation.</p>
NG17 Fulmar	



#### North Sea Wildlife Trusts

Northumberland  
Durham  
Tees Valley  
Yorkshire  
Lincolnshire  
Norfolk  
Suffolk

Sheffield  
Nottinghamshire  
Derbyshire  
Leicestershire and Rutland  
BCNP (Bedfordshire,  
Cambridgeshire,  
Northamptonshire and  
Peterborough)

#### Presentation of ecological information

- The draft final recommendations document focuses heavily on the discussions (primarily socio-economic) that have taken place at hub meetings, these should be included within an annex or impact assessment documents and not form the focus of the recommendations document as it detracts from site recommendations (advice supported by the SAP and StAP).
- The final recommendation document should include where possible full ecological narratives, a list of supporting evidence as well as photography where appropriate/possible to support each dMCZ. As such we welcome the invitation to attend discussions regarding development of ecological profiles for the dMCZs. We recognise Net Gain has begun this process but few supporting ecological references or site details are given within the current documentation and as such need development. We welcome the meetings Net Gain have arranged to rectify this situation and will be in attendance to assist with this task.
- To date the AAEI tables provide an insight into dMCZ ecological importance but are limited and can be misleading e.g. both NG2 and NG8 are two highly productive areas of seabed with unique and in the case of NG2 chalk reefs features of potential European importance and yet in terms of site narrative NG2 is low terms of biotope importance and rates 4/10 for pelagic importance, making it appear a relatively unproductive site.

#### Basic dMCZ site details

- Confusion has arisen regarding some sites due to too much detail regarding hub discussions within the document, e.g. hub discussions suggest features are not included within site recommendations, whereas feature tables suggest they are. It is crucial the documentation represents clearly and accurately site features and as such we request time is dedicated at the Large Group Meetings to clarify with stakeholders exactly what features are included within the dMCZs.
- Basic information is also required for each site such as location; start/end point/distance out to sea at present central centroid locations within sites provide little information.
- Each dMCZ narrative includes features included/omitted from site recommendations, not all omitted features are supported by information detailing why they have been omitted.
- We recommend, to ensure clarity each dMCZ write up presents initially the site map followed by site features and description. Current resolution of site maps is not high enough to determine where a site begins e.g. mean high/low water, 200metres offshore. To clarify more than one map may be required for each dMCZ recommendation in the final documentation zooming in on specific features.
- The nature of the Net Gain process has throughout laid emphasis on regions, e.g. North East, Yorkshire and Humber, Lincolnshire and East of England. The draft recommendations document reflects this and as such interpreting the recommendations in terms of the full regional network is challenging. Accompanying the full dMCZ and full MPA network maps, page 15-17 we also recommend the incorporation of a table detailing all sites to accompany these illustrations.

#### ENG targets

We are disappointed to see changes in the revised gap analysis have led to adequacy targets now not being met for Subtidal Mud, whilst the Net Gain project is in operation there is the opportunity to amend this via re-instating NG14S. Whilst this site has caused stakeholder contention it would allow the project to meet ENG broadscale habitat adequacy targets and re-instate a site of high AAEI. We would strongly support this and encourage Net Gain to follow the MCZ process guidance and put the site forward but with low stakeholder support if necessary rather than remove it completely as a recommendation in order to meet the ENG targets (SAP advice 3.1).

#### Geological/Geomorphological features

We welcome the inclusion of GCR features within the draft final recommendations however recommend Net Gain develop detailed portfolios for GCR sites in the same way as for ecological sites. The project has suffered from lack of stakeholders with geological knowledge within the process; this is reflected in the poor narratives given within the documentation for GCR features.



#### North Sea Wildlife Trusts

Northumberland  
Durham  
Tees Valley  
Yorkshire  
Lincolnshire  
Norfolk  
Suffolk

Sheffield  
Nottinghamshire  
Derbyshire  
Leicestershire and Rutland  
BCNP (Bedfordshire,  
Cambridgeshire,  
Northamptonshire and  
Peterborough)

#### Reference areas

We welcome the recommendations of reference areas within the iteration but are concerned by the lack of documentation regarding areas which underwent discussion but received little stakeholder support, such as the Dogger Bank, Flamborough Headland and the Durham Heritage Coast. The discussions around these sites have affectively been lost from the draft final submission. It is considerably important that the discussions regarding these sites are captured whether or not the recommendations are put forward to final submission. It is particularly important in the case of the Dogger Bank that discussions are recorded as the May hub meetings saw Net Gain inform stakeholders this discussion would be handed over to the JNCC alongside the narrative from the meeting to be inputted and discussed in further detail within the FIMPAS project. Essentially discussions regarding this site were influenced by one stakeholder who had previously had no direct engagement within hub meetings, I recommend that Net Gain either document this site as a recommendation with lower stakeholder support than other reference areas and capture the discussions surrounding this site alongside those had for Flamborough Headland and the Durham Heritage Coast within an annex of the submission at least.

Regarding reference area recommendations for scientific and research purposes we agree with the SAP comment 2.11 that minimal discussions have occurred. We continue to see the omission of key ecological sites and sites for scientific and monitoring value as a serious flaw of this process. Within the Net Gain region there are key examples of sites which have shown the ability to recover and thrive given the opportunity, these sites are key sites for scientific and research value and should have been incorporated within the Net Gain area as reference sites.

A prime example of this is the Durham Heritage Coast, a site which was up until a few years ago considered to be of low ecological value, however on cessation of the colliery dumping activity within this area both the seabed features and associated species within the area began to thrive and develop, we have seen these changes over recent years through Seasearch dives and have highlighted this at repeated occasions throughout this process. This site although not the most ecologically productive site within the Net Gain region should have been a prime candidate for scientific research and monitoring due to its potential for recovery, and inshore location, located close to high levels of scientific activity (i.e. through both university and NGO survey). The Durham – Teesside region has never received adequate discussion time within hub meetings as such sites such as the Heritage Coast remain omitted from the network with little capture of discussions surrounding the area. In line with the SAPs comments 2.11 and suggestions regarding connectivity 5.2 we recommend Net Gain address the issue of a considerably large gap between the Yorkshire and North East hub recommendations.

Following discussions undertaken at the StAP meeting on 4<sup>th</sup> July we strongly support the recommendations of Gibraltar Point reference area and note that at the Lincolnshire hub group socio-economic considerations strongly influenced the location of this site to achieve a high level of consensus.

#### Stakeholder consensus

Stakeholder consensus has been a key driving factor for the identification of draft MCZs and has led discussions away from sites of high ecological importance that co-inside with high levels of socio-economic activity. We recommend in order to capture areas of high ecological pelagic and benthic importance that recommendations put forward by conservation representatives attending Net Gain hub meetings are recorded within the draft final network. It would be a far more favourable situation to put a site recommendation forward and log consensus rather than loose the recommendation completely.

#### AAEI

To clarify comments regarding the inclusion of AAEI within the dMCZ network, in general dMCZ site locations were established in October prior to the full ecological pelagic and benthic data layers being made available to the project in March, as such the AAEI data layers were used subsequently to help guide 'clipping' of sites not to guide site identification, hence as the SAP suggests in point 2.10 'there is little evidence to suggest AAEI have been taken into account positively in setting site boundaries', we are therefore keen to see the SAP recommendation 'this should be addressed by the Regional Project in their final recommendations' put into play during the final stages of the project. We also note that although the ability to add additional sites was halted before the ecological data layers were made available to stakeholders we continued to see site boundaries clipped to accommodate for social and economic activities.



North Sea Wildlife Trusts

Northumberland  
Durham  
Tees Valley  
Yorkshire  
Lincolnshire  
Norfolk  
Suffolk

Sheffield  
Nottinghamshire  
Derbyshire  
Leicestershire and Rutland  
BCNP (Bedfordshire,  
Cambridgeshire,  
Northamptonshire and  
Peterborough)

Conservation objectives and management measures;

We welcome the recommendations put forward by JNCC at the StAP meeting and support the addition of a recovery objective for Ross Worm within the Inner Silver Pit and the precautionary principle (as advised by JNCC) to be adopted to both NG16 and 17, to take forward these two sites with a recovery conservation objective.

I hope the recommendations we have identified can be accommodated through the final stages of this process. We urge that focus is given at the large group meeting to clarify site features for each dMCZ and amending omissions within the final network recommendations.

Yours sincerely,

Kirsten Smith  
North Sea Living Seas Manager

*Sent on behalf of Wildlife Trust staff Net Gain hub representatives*

*cc'd*

*Steve Lowe – Northumberland Wildlife Trust (NE hub representative)*

*Paul Learoyd- Lincolnshire Wildlife Trust (LW hub representative)*

*John Hiskett – Norfolk Wildlife Trust (EE hub representative)*

*Helen Craven – The Wildlife Trusts*

*Jim Cokill – Durham Wildlife Trust*





**Feedback following submission of Draft Final Recommendations report to SAP – June 2011**

Name: **Mark Russell** Regional Hub: **EE/LW/Y**

Sector represented: **Marine aggregates**

Please explain briefly how the feedback you are presenting was collected: **A combination of meetings, telephone conversations and email exchanges with member companies**

Please indicate how many people you have been able to discuss this feedback with: **The following operating companies with marine aggregate interests in the NG region - Hanson Aggregates Marine, CEMEX UK Marine, Tarmac Marine Dredging, Volker Dredging, Britannia Aggregates, Westminster Gravels, Van Oord, DEME Building Materials & Sea Aggregates**

Confidence for proposed site, scoring as 1 to 4: 1 - strongly against; 2 -against;3 -support; 4 - strongly support

Site	Level of support	Implications if site is designated	Any other comments
NG 9	Currently 2 (against) but could be 3 (support) if status of indirect issues are clarified	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km<sup>2</sup> to the south (Areas 102 &amp; 105).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>We note that the boundaries of the original sites NG2.9/2.10/2.13 were amended in Iteration 3 to remove any direct interaction with marine aggregate interests. The location of these interests relative to the refined site boundaries (to the south, along the tidal axis) means that there are still residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>Operators need confidence that the current buffer distances between the dMCZ and aggregate interests are sufficient to mitigate the significance of any indirect pressures. This appears to be demonstrated in the draft vulnerability assessment – albeit this needs to be verified by the SNCB review.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a precautionary score of 2. However, the site opinion could shift to a more positive position if SNCB clarifications are provided.</p> <p>However, if the SNCB review suggests that the proximity of existing marine aggregate interests could result in significant pressures on site features, consideration should be given to modifying dMCZ boundaries to increase the buffer distances.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG 8	Currently 2 (against) but could be 3 (support) if status of indirect issues are clarified	<p>Although outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km<sup>2</sup>.</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>The site lies approximately 1nm cross tide to the nearest marine aggregate interests further offshore to the east. Consequently based on knowledge and evidence of impacts – direct and indirect, the residual concerns over the implications of potential indirect plume impacts arising from extraction operations are far more limited – albeit this requires confirmation.</p> <p>Operators need confidence that the current buffer distances between the dMCZ and aggregate interests are sufficient to mitigate the significance of any indirect pressures. This appears to be demonstrated in the draft vulnerability assessment – albeit this needs to be verified by the SNCB review.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a precautionary score of 2. However, the site opinion could shift to a more positive position if SNCB clarifications are provided.</p> <p>However, if the SNCB review suggests that the proximity of existing marine aggregate interests could result in significant pressures on site features, consideration should be given to modifying dMCZ boundaries to increase the buffer distances.</p>



Site	Level of support	Implications if site is designated	Any other comments
NG 6	Currently 2 (against) but could be 3 (support) if status of indirect issues are clarified	<p>Area 480 has the potential to result in both direct and indirect impacts on the proposed site, while Area's 106 &amp; 105 could result in indirect effects.</p> <p>In all cases, if these impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £8.675m/km<sup>2</sup>.</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>We note that the south west boundary of NG6 (Iteration 3) have been refined, and that these amended limits now correspond more directly to the eastern boundary of Area 480, an active marine aggregate production licence. The boundaries also lie immediately adjacent to Areas 106 and 105.</p> <p>The implications for Area 480 – whether within or immediately adjacent – need to be clarified. The location of this interest (to the immediate west) relative to the refined site boundary, along with other production licence areas located immediately west of the western boundary, means that there are residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>Operators need confidence that the current buffer distances between the dMCZ and aggregate interests are sufficient to mitigate the significance of any indirect pressures. This appears to be demonstrated in the draft vulnerability assessment – albeit this needs to be verified by the SNCB review.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a precautionary score of 2. However, the site opinion could shift to a more positive position if SNCB clarifications are provided.</p> <p>However, if the SNCB review suggests that the proximity of existing marine aggregate interests could result in significant pressures on site features, consideration should be given to modifying dMCZ boundaries to increase the buffer distances.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG 4	Currently 2 (against) but could be 3 (support) if status of indirect issues are clarified	<p>Although marine aggregate interests fall largely outside of the proposed dMCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £6.4m/km<sup>2</sup> to the north (Area 440) and £8.675m/km<sup>2</sup> to the south (Areas 107 &amp; 481).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>We note that the northern east/west boundary of NG4 (Iteration 3) has been moved to the south minimise the potential for direct and indirect interaction with marine aggregate interests. The location of these interests relative to the refined site boundaries (particularly immediately to the north) means that there are still residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>While we recognise that the site proposal does not significantly directly interact with existing marine aggregate interests, the location of marine aggregate interests along the tidal axis from the dMCZ, means that there are residual concerns over the implications of potential indirect plume impacts arising from extraction operations. There is also a marginal overlap with a marine aggregate production licence – albeit this was considered to be insignificant.</p> <p>Operators need confidence that the current buffer distances between the dMCZ and aggregate interests are sufficient to mitigate the significance of any indirect pressures, and that any direct overlap is considered to be insignificant. This appears to be demonstrated in the draft vulnerability assessment – albeit this needs to be verified by the SNCB review.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a precautionary score of 2. However, the site opinion could shift to a more positive position if SNCB clarifications are provided.</p> <p>However, if the SNCB review suggests that the proximity of existing marine aggregate interests could result in significant pressures on site features, consideration should be given to modifying dMCZ boundaries to increase the buffer distances.</p>

Site	Level of support	Implications if site is designated	Any other comments
NG 1b	Currently 2 (against) but could be 3 (support) if status of indirect issues are clarified	<p>Although marine aggregate interests are located outside of the MCZ site boundary, if indirect impacts are considered to be unacceptable there is the potential for significant loss of capital asset (as indicated by the resource valuation figures provided by The Crown Estate) equivalent to £10.85m/km<sup>2</sup> to the north (Area 496) and £3.4m/km<sup>2</sup> to the south (Area 507/2, 507/5 &amp; 498).</p> <p>If these assets are lost or significantly constrained, there will be the requirement for replacement resources to be identified elsewhere with significant development cost impacts and also potential production delays and operational costs if replacement is further from market.</p> <p>Operational mitigation to reduce the magnitude of indirect impacts – such as minimising screening or only dredging at certain stages of the tide – could also result in significant commercial implications, potentially rendering a licence area uneconomic.</p>	<p>We note that the boundaries of NG1b (Iteration 3) have been amended. The northern section was redefined based on a cable corridor – this considerably increases the distance to the aggregate interests in the north, reducing the risks of indirect effects. To the south, further amendments were made based on the exclusion of the south western corner (another cable corridor) and agreement was reached for the southern boundary to be moved 500m further north to again reduce the risks of indirect effects.</p> <p>While we recognise that the site proposal does not directly interact with either existing and proposed marine aggregate interests, the location of marine aggregate interests along the tidal axis from the MCZ, means that there are residual concerns over the implications of potential indirect plume impacts arising from extraction operations.</p> <p>Operators need confidence that the current buffer distances between the dMCZ and aggregate interests are sufficient to mitigate the significance of any indirect pressures. This appears to be demonstrated in the draft vulnerability assessment – albeit this needs to be verified by the SNCB review.</p> <p>Because of the uncertainties relating to indirect impacts and lack of clarity over what this could mean in practice we have registered a precautionary score of 2. However, the site opinion could shift to a more positive position if SNCB clarifications are provided.</p> <p>However, if the SNCB review suggests that the proximity of existing marine aggregate interests could result in significant pressures on site features, consideration should be given to modifying dMCZ boundaries to increase the buffer distances.</p>

Joanna Redhead  
Project Manager  
Net Gain  
The Deep Business Centre  
Tower Street  
Hull  
HU1 4BG

Your ref: -  
Our ref: 2/21/JW/JCS

29<sup>th</sup> July 2011

Dear Joanna

## **FEEDBACK ON NET GAIN DRAFT FINAL RECOMMENDATIONS**

Thank you for the opportunity to comment on the report. Eastern IFCA believes that the final report is an extremely important output, as it represents many months of work on the part of the Net Gain team and stakeholders alike. Therefore, it is important that it stands as a true and accurate record of the site selection process, and that it is able to withstand the scrutiny that will no doubt be directed towards it.

### General comments

There are some concerns regarding referencing throughout. Although I have highlighted in my comments, below, inconsistencies for the sites reviewed within the Eastern IFCA District, it is suggested that all references for supporting documentation are checked thoroughly.

Our comments are based on the version of the report currently on the website, which is version 2 (dated 14<sup>th</sup> June).

### Site specific comments

#### *NG 1c: Alde Ore Estuary*

- Site surface area inconsistent between description and chart (12.24km<sup>2</sup>, 71.9km<sup>2</sup> respectively)
- Referencing (p37) completely inconsistent with the list on p43– e.g. ABPmer, 2010. Not only should the reference cite the author (not the publishing authority, which is likely to produce many similar reports over a calendar year) precisely to avoid confusion, the dates are incorrect for some citations. The HOCI appear to have been derived from Tyler-Walters *et al.*, 2009; the SOCI from Ellis *et al.*, 2010 – both reports are by ABPmer but are not the same entity as suggested in the table. Again, “Natural England 2010” bears no clear relation to anything on p43 (presumably Defra, 2009?).
- Please clarify how consensus was reached on returning the Orfordness geological feature to the site; the narrative records Natural England’s suggestion, but surely there was group discussion around its inclusion in the designation?

*NG 2: Cromer Shoal Chalk Beds*

- Site surface area inconsistent between description and chart (322.76km<sup>2</sup>, 315.49km<sup>2</sup> respectively)
- Referencing is once again inconsistent. "JNCC, 2010" should read "McBreen, UK SeaMap 2010" or similar. "ABPmer, 2010" should read "Tyler-Walters *et al.*, 2009" and the "Natural England, 2010" reference is incorrect.
- A comment made by ESFJC (as we were then) at the March meeting is not reported: ESFJC stated that although there is consensus among commercial fishing representatives present at the meeting, other fishing sectors should also be considered.
- In the May narrative (p49) the following sentence: "the group had discussed these issues at the last Hub meeting"... While we agree that these discussions took place, the March narrative does not actually reflect this.

*NG5: Lincs Belt*

- Please check the referencing (see earlier comments).
- Suggest changing sentence word order (second paragraph, p72) to "...the representatives for all of them [types of fishing] have not been present..."
- Suggest revising sentence (last paragraph of March narrative) to add (as highlighted): "... the southern boundary had already **been moved** in previous meetings..."
- We would query if the conservation objective should be "recover" or "maintain" – we believe discussions have been had to this effect; would it be possible to document these within the narrative?

*RA EE1: Blue Mussel Beds*

- Title should include the words "Reference Area" or "RA" (both at the page title, and in the site name throughout)
- Please check the referencing (see earlier comments)
- The narrative for this site is confusing, as both the original site and the final site are discussed throughout – generally with little clarity as to which is which (and this from an attendee of the meetings – I imagine anyone outwith would have greater trouble). I would suggest making clear differentiation between the two – perhaps referring to the former as the "Sea Palling site" or RA EE1a and the latter as "NG2" site or RA EE1b.
- Incorrect statement in first paragraph on site boundary (p253): "The site currently covers ca. 50% of a no-trawl zone." This is wrong – suggest removing the sentence; unsure what the intended meaning is, so no suggestion as to an alternative.
- EIFCA would also like to reiterate that mussel beds on mobile sediment are generally ephemeral to some degree, and there is no guarantee that they will persist, regardless of management measures.

*RA LW 1a and 1b: Peat and clay exposures*

- Title should include the words "Reference Area" or "RA" (both at the page title, and in the site name throughout)
- Please check the referencing (see earlier comments)
- The boundaries presented do not appear to have been changed to reflect what was agreed at the May hub meeting (an area somewhere between the two locations) so it is difficult to comment on the boundaries, site extent or even the proposed features to be designated– which presumably may differ from those illustrated.

*RA LW 3a & 3b: Starlet sea anemone*

- The boundaries presented do not appear to have been changed to reflect what was agreed at the May hub meeting (two areas bisected by the access boardwalk) so it is difficult to comment on the boundaries, site extent or even the proposed features to be designated. However, the feature proposed for designation remains the same.

*RA LW 4: Seagrass beds*

- Please check the referencing (see earlier comments)
- "RA" should be part of the site name throughout to remain consistent
- Subsequent to the draft report being published, concern was raised over ongoing baitdigging and low-intensity cockling activity, which hadn't been flagged up. The seagrass beds are unlikely to be coincident with the bait digging areas as the latter are predominantly covered by water, but a buffer around the feature could extend into areas currently of significant importance to a small number of fishers. Given the discrete nature of the seagrass bed, we would suggest that there need not be much of a buffer – but a detailed site survey is really needed to determine the proximity of the seagrass beds to other activity now known to occur nearby.

*RA LW 5: Inner Outer Dogs Head Sandbanks*

- Please check the referencing (see earlier comments)
- "RA" should be part of the site name throughout to remain consistent
- To emphasise the point made (paragraph following the table on p295), consensus was gained for this site on the basis that only the intertidal features would be designated, so that fishing and recreational activities in the surrounding subtidal areas are not restricted. If necessary, data held needs to be sense-checked before final designation, as it appears to be contradictory – something to highlight even more clearly in the report.
- As a corollary to the above comment, we would query the inclusion of the subtidal features in the designation altogether.
- Correction (paragraph 3, p297): "Boston fishermen fish for **shrimp** through the channels..." (not mussel, as stated)
- Throughout the narrative, the area is misspelled as the Inner or Outer "Doggs" Head (should be Dogs, one g).
- Comment re: last sentence, p298: the boundary of the SSSI actually bisects the site (in fact, this is visible on the left inset of Figure 26, p296) so that part is inside the SSSI, and part outside.

Thank you once again for providing an opportunity to comment on this report. I hope these comments are useful to you, and that they can contribute to the final report; please do not hesitate to get in contact with myself or my colleague, Judith Stoutt, if you require clarification on any of the points made.

Yours sincerely,

Jessica Woo  
Research Officer / Assistant Marine Environment Officer



## CCSA Input to Netgain 4<sup>th</sup> Iteration Impact Assessment

The CCSA welcomes this opportunity to respond to Netgain 4<sup>th</sup> Iteration Impact Assessment.

The CCSA brings together a wide range of specialist companies across the spectrum of CCS technology, as well as a variety of support services to the energy sector. The CCSA exists to represent the interests of its members in promoting the business of Carbon Capture and Storage (**CCS**) and to assist policy developments in the UK and the EU towards a long-term regulatory framework for CCS as a means of abating carbon dioxide (**CO<sub>2</sub>**) emissions.

Due to the short timescale for comments, we would like to limit our comments at this time to the 4<sup>th</sup> iteration impact assessment.

We welcome the inclusion of CCS as a sector that requires consideration as part of the Impact Assessment process and look forward to inputting into the relevance of CCS to specific dMCZs. We have some comments on what form the CCSA input might take.

Specific comments:

- The Marine Management Organisation (MMO) has conducted a spatial mapping exercise as an aid to marine planning. This is published in their Strategic Scoping Report and highlights areas that are considered probable CO<sub>2</sub> geological storage sites in English waters. As an initial step, the overlap between potential CO<sub>2</sub> storage sites and dMCZs should be identified. The next step is to calculate the likely impact of MCZ designation on CO<sub>2</sub> storage for CCS. This is a time consuming exercise and will require consultation with CCSA members. This is a work area that we intend to explore later this year. Given the early stage of CCS development we would anticipate that these figures would be indicative and subject to some uncertainty, but nonetheless provide an important source of information for assessing the socio economic benefits of CCS.
- Some stakeholders have expressed concern at the level of comprehensiveness of the evidence base that is used to inform MCZ designation. While we hope to assist you in improving this evidence base, in terms of CCS specific evidence, we must add our voice to those who are concerned over the robustness of the evidence used to inform the development of MCZs. Combined with the application of the precautionary principle, an inadequate evidence base may result in excessively stringent restrictions on CCS deployment, or even prohibit it in certain areas. This

has the potential to compromise CCS's role as a vital climate change mitigation tool and the UK's ability to meet its obligations under the Climate Change Act.

- We also foresee the likelihood of duplication between the MCZ regulatory and administrative processes and Environmental Impact Assessments (EIAs). EIAs already place an obligation on developers to fully appraise the likely environmental impacts of any development proposal. They provide a valuable information resource which can inform MCZ development. Given the costs association, we hope that developers would only be asked to provide information that does not already appear in the EIA report and only if it clearly provides extra value.
- We do note that it is somewhat anomalous that CCS does not appear as a Human activity (section D.2).

We would suggest that this is rectified by adopting the wording used by the Marine Management Organisation (MMO) in its Strategic Scoping Report (<http://www.marinemanagement.org.uk/marineplanning/ssr.htm>), published recently.

The relevant text appears below:

“Directive 2009/31/EC28 of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide (hereafter referred to as the CCS Directive) describes carbon capture storage (CCS) as a bridging technology that will contribute to mitigating climate change. The CCS Directive requires the Government to introduce arrangements to ensure that potential users are able to obtain access to carbon dioxide transport networks and storage sites. It states that CCS should be used in addition to the reduction in reliance on fossil fuels and a commitment to developing other low carbon technologies.

The Impact Assessment of the Directive estimated that 7 million tonnes of carbon dioxide could be stored by 2020 and up to 160 million tonnes by 2030, providing that CCS proves to be an environmentally safe technology. This could account for 15 per cent of the reduction required across the EU.

The manner in which carbon dioxide infrastructure projects are developed in the near term will have significant impact on how a wider regional or national infrastructure will develop in the medium to long term. A regulatory framework is being developed in place in England by the Department of Energy and Climate Change (DECC29). At the same time they are working to produce a Roadmap30 which will describe a shared understanding between the Government and key stakeholders of the 81 potential role of CCS in reducing emissions from the power and industrial sectors and the issues that need to be addressed to enable commercial deployment of CCS, by when and the organisations responsible for taking action. The Roadmap will be a living document and action plan used to



track progress and will provide a framework to identify and address new issues. The Government does not intend to be prescriptive about technology choices or set targets in the Roadmap which will comprise two elements: a strategy style document setting out potential deployment scenarios and trajectories and the barriers and actions required to address them; and an “action map” showing a timeline of activity required to address barriers.

DECC completed some work as part of the 2050 Pathways analysis to predict the capacity for CCS under different scenarios. There are a number of technical challenges to the wide scale use on both coal and gas. In the short term, CCS is likely to be applied to coal, but this will be dependent on competitiveness of cost compared to other low carbon generation technologies. CCS on gas may well be more viable in future as it is less capital intensive than coal and this could be a more economic solution to back up intermittent renewable energy sources.

The Government has submitted seven applications from CCS projects to the European Investment Bank (EIB) for consideration in the next round of the EUs New Entrant Reserve (NER) scheme – a fund worth around EUR4.5 billion to support carbon capture and storage (CCS) and innovative renewable projects across the European Union. Up to three projects may be supported per Member State.

Of these seven four are in England:

- oxyfuel new supercritical coal-fired power station on Drax site in North Yorkshire;
- new integrated gasification combined cycle (IGCC) power station (pre-combustion with CCS on the coal-feed) in Killingholme, Yorkshire;
- new IGCC power station in Stainforth, Yorkshire;
- pre-combustion coal gasification project in Teesside, North East England; “

We understand that the final draft recommendations and Impact Assessment will now be submitted to the SAP, however we would welcome the opportunity to provide more comprehensive comments to this process at a later date – perhaps in an informal manner.



## Feedback following submission of Draft Final Recommendations report to SAP – June 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

As you will appreciate, following the last round of hub meetings, we are no longer intending to make changes to site boundaries or to site features. We are however interested in capturing information on the levels of support for each site and feedback on any potential implications that may accompany site designation. Please refer to the draft final recommendations report for details on where additional management measures may be required (many features currently have their conservation objectives set to 'maintain' and it is consequently likely that many sites will not require additional management). For these reasons the layout of the form (below) has altered slightly from that used previously.

**Please use this form to record your feedback.**

Name Dale Rodmell, National Federation of Fishermen's Organisation Regional Hub: Yorkshire, Lincolnshire, East Anglia, StAP  
Sector represented Fishing Industry

Please explain briefly how the feedback you are presenting was collected:

The following reflects feedback from within the NFFO and its membership. It does not reflect a full response to the whole recommended network given the absence of available refined information on potential management measures and time available to elicit responses.

Please indicate how many people you have been able to discuss this feedback with:

Representatives of the respective fleets who fish the areas proposed for site locations.

**Feedback received by Friday 8th July will be used to help inform discussions at the Large Group Meeting in Hull (scheduled for 19<sup>th</sup> & 20<sup>th</sup> July).**

<b>Site</b>	Level of <b>support</b> and confidence for proposed site, scoring as 1 to 4: 1. strongly against; 2. against; 3. support; 4. strongly support	What are the <b>implications</b> for your sector if the site is designated (if applicable please include both positive and negative implications)	Any other <b>comments</b>
rMCZ5	1	The southern section of the site is subject to mobile bottom gear fisheries which would potentially be precluded access in the future.	We consider it reasonable that the southern boundary of the site is amended in order to minimise socio-economic impacts, whilst continuing to achieve the Ecological Network Guidance.

rMCZ6	1	<p>Within a wider region where fishing activity has declined substantially over the last 10-20 years, the central Inner Silver Pit forms a primary focussed fishing ground for whitefish otter trawl gears. The area fished is focussed on the bottom central part of the Inner Silver valley feature. The valley sides are not subject to mobile bottom gears, the northern part of the site has not been subject to mobile gears and the southern part of the site is only intermittently subject only to light shrimp gears. Should activity be displaced from this focussed part of the site, displaced activity would tend to be directed to less productive grounds, thereby increasing seabed impact by increasing the required effort to catch equivalent quantities of fish.</p>	<p>Consistent voicing of concerns over this site by our sector have routinely been noted and dismissed in the Lincolnshire and Wash hub group. These concerns have been resisted primarily by the Natural England representative, despite a lack of a proven basis for the site’s selection on biodiversity grounds and against consideration of the negative consequences of potential displacement.</p> <p>AAEI information released to the project does not indicate the southern part of the Inner Silver pit feature area is particularly significant from a biodiversity perspective, relative the surrounding region and national scales. The biotope score of medium listed in the draft recommendations report appears to represent a trade off between a high score for the northern part of the site and a low score for the southern part of the site. The available species biodiversity data does not appear to support a high grading that is given in the report – again the southern part of the site is given a low grading, whilst data appears to be missing for much of the northern portion. This evidence justifies in our view that it is reasonable to allow this long standing fishery to continue in the central part of the site.</p> <p>The NFFO has sought a mutual outcome that satisfies all interests given the particular circumstances of this site and considers at this stage that a reasonable and pragmatic resolution has yet to be achieved.</p>
rMCZ9	N/a	<p>Our anglo-dutch members have indicated that the northern west section of the site is an important fishing ground which they would potentially be displaced from, forcing concentrated effort onto their fishing grounds.</p>	<p>Given the presence of local potting interests in the area (also under NFFO membership), it may be possible to make a boundary adjustment that respects fishing gear coexistence, whilst meeting the needs of the Ecological Network Guidance. Project timing has not allowed for this matter to be addressed. Alternatively, a zoned management regime may allow for a similar pragmatic approach to prevail.</p>

rMCZ 11	1	Our anglo-dutch members have indicated this is an important area for their fishing activities. It is also a fishing ground for UK vessels whose activities potentially stand to be displaced.	Our anglo-dutch members have identified an alternative site where the available data indicates lower fishing activity and higher levels of AA EI. Whilst this needs ground truthing with other parts of the fishing industry and other considerations it appears to offer a better site from both a socio-economic and ecological perspectives.
rMCZ 16 / Swallow Hole feature	1	The Swallow Hole feature forms an important fishing ground for whitefish otter trawlers. Should activity be displaced from this focussed part of the wider site displaced activity would tend to be directed to less productive grounds, thereby increasing seabed impact by increasing the required effort to catch equivalent quantities of fish.	Other than the feature being listed as a feature of geological importance, there exists no AA EI data to suggest that it should be preferentially selected as an MCZ for broad scale habitat designation. In order to satisfy the Ecological Network Guidance whilst minimising the socio-economic impacts of designation the feature and area defined by relatively high fishing activity should be separated from the wider site and the Swallow hole included as a geological feature only. We are surprised given ongoing concern over this area from the fishing industry that this did not take place in the hub meetings when other parts of the site have been cut back due to the adequacy target for sand being more than satisfied by the network.
RA NE1	1		Whilst we oppose the selection of reference areas on the grounds of statutory legitimacy, proportionality and practical planning reasons, we are also concerned that reference areas should not be any larger than the minimum area in order to fulfil their monitoring purpose. The SAP feedback and ENG guidance on this matter that reference areas should be within a predefined size range, and above the minimum size, this cannot in our view be justified scientifically if the purpose of the site is for monitoring purposes. On this basis RA NE1 appears to be unnecessarily large.

When complete, please email to [info@yhsg.co.uk](mailto:info@yhsg.co.uk) or return to:

Net Gain  
The Deep Business Centre, Tower Street  
Hull, HU1 4BG



## Feedback following submission of Draft Final Recommendations report to SAP – June 2011

As discussed at the recent Regional Hub meetings, it is important that Regional Hub members are able to liaise with their wider sectors or organisation members and provide feedback and input on the draft MCZ areas that have been identified in the Regional Hub meetings.

As you will appreciate, following the last round of hub meetings, we are no longer intending to make changes to site boundaries or to site features. We are however interested in capturing information on the levels of support for each site and feedback on any potential implications that may accompany site designation. Please refer to the draft final recommendations report for details on where additional management measures may be required (many features currently have their conservation objectives set to 'maintain' and it is consequently likely that many sites will not require additional management). For these reasons the layout of the form (below) has altered slightly from that used previously.

**Please use this form to record your feedback.**

Name Pim Visser, chief executive of VisNed, (Association of Dutch Demersal Fisheries Producer Organisations) Regional Hub YH  
Sector represented Dutch Fisheries

Please explain briefly how the feedback you are presenting was collected:

We consulted our membership, using their trackplotdata, to compare with proposed sites

Please indicate how many people you have been able to discuss this feedback with: a representation of 50 individual skippers

***Feedback received by Friday 8th July will be used to help inform discussions at the Large Group Meeting in Hull (scheduled for 19<sup>th</sup> & 20<sup>th</sup> July).***

Site	Level of <b>support</b> and confidence for proposed site, scoring as 1 to 4: 1. strongly against; 2. against; 3. support; 4. strongly support	What are the <b>implications</b> for your sector if the site is designated (if applicable please include both positive and negative implications)	Any other <b>comments</b>
7	1	Good fishing grounds will be lost and effort will be displaced. Restoration to a pristine situation is unlikely and other areas will be heavier fished. In all the impact of this proposed improvement to the ecosystem will have a detrimental effect because of the specifics of the triangular site now know as site nr 7.	The features to be protected in this site are ill documented. We have therefore proposed a new site nr 7 with protection of similar values, but without adverse effect on the Fishing Sector, therefore not leading to displacement and a more balanced end result. This site neighbours to a Dutch N 2000. If the site is to remain, designation and management should be aligned with the current Fimpas process for Cleaverbank
9	1	Good fishing grounds will be lost and effort will be displaced, because the area with the specific characteristics is much smaller than the area of the proposed site .	The site is too big for the values to be protected. The North east top is to be cut off, in order to allow fisheries to take place, if possible . Fishing intensity is already being reduced by potting activities.
all			The overall fishing intensity by the Dutch beamtrawl fleet is reduced by 45% over the last 10 years. The remaining Dutch beamtrawl fleet is in transition to low impact fisheries, using SUM Wing and pulse gear. This is a on going development/improvement which makes existing impact data of much less value. The knowledge of fisheries stakeholders is essential in deciding on management issues. We fear 'overkil' in management measures

When complete, please email to [info@yhsg.co.uk](mailto:info@yhsg.co.uk)

or return to:

Net Gain

The Deep Business Centre, Tower Street

Hull, HU1 4BG

Joanna Redhead and Steve Barnard  
NetGain

By email only

29<sup>th</sup> July 2011

Dear Joanna

Following the large Group meeting held in Hull on 19<sup>th</sup> and 20<sup>th</sup> July 2011, SMart Wind welcomes the opportunity to submit feedback to Net Gain regarding the draft final MCZ recommendations.

Firstly, may we commend Net Gain for a well structured and informed process since inception. It has been well received by all stakeholders and given everyone an opportunity to understand the opportunities and constraints for marine users.

Although I don't have a copy yet of the slides presented during the workshop last week, I noted that it was re-emphasised and accepted throughout the meetings that there will be no additional EIA requirements due to MCZ designation.

Throughout the Net Gain process in earlier Yorkshire & Humber Regional Hub meetings we have repeatedly requested discussions, or at least early indications, regarding the range of management conditions that may be proposed for developments within, or in close proximity to, draft MCZs. Without any understanding of how conditions would be captured in licenses/consents, we had little choice but to adopt a precautionary approach in the earlier meetings whereupon boundaries of draft MCZs were identified.

We were told that the management conditions would be discussed at future Net Gain meetings. It is therefore very disappointing that when we attend the final 2 day Net Gain meeting with this exact topic on the agenda, we are told at the meeting that this discussion will exclude licensed activities (including offshore wind development) which will have their management conditions addressed by their respective Regulator, in our case the MMO, through the issue of Marine Licenses and conditions contained within. The session on management conditions at the Large Group Meeting last week in Hull therefore focussed on how management conditions could be effectively be transposed through management of fishing practices.

It is equally frustrating that no discussion was invited on the recently issued Version 5.0 of the joint JNCC and NE paper titled "*Advice on the impacts of MCZs on information provision and decisions in relation to marine licensing proposals*", noting that Version 1.0 was issued in February 2011 and Version 4.0 was issued to the Regional MCZ Projects on 20/04/2011. As far as I'm aware, Version 4.0 was not distributed at previous MCZ meetings. Most of the junior NE / JNCC staff at the ISCZ and Netgain meeting last week were not even aware this document had been produced and or published. The advice note contains a number of concerning



statements that contradict the position made at the Net Gain meetings in relation to there being no additional EIA requirements due to MCZ designation, such as:

Para 5.1 – *“....the assessment may be more complex and collecting and presenting evidence could be more time consuming and costly.”*

Para 5.2 – *“A requirement to take account of network considerations would result in additional costs to the operator in time and effort.”*

We very much hope that we receive an opportunity during the public consultation period to discuss the range of potential management conditions that could be imposed as a result of MCZ designation in 2013. The additional costs and time should be considered by the Government before any MCZs go forward for consultation. SMart Wind has one proposed MCZ within our development zone (NG7) and at least four nearshore proposed MCZs within our potential export cable route corridors for Project One (NG8, NG9, NG6 and NG5). Without certainty of the management measures that may be imposed at the development (surveys), construction and O&M phases of our existing and future projects within the 4,735 sq km of the Hornsea Offshore Wind Zone, it will add unnecessary risk to the development of a Nationally Significant Infrastructure Project (NSIP).

Finally, I would question the lack of representation of the Oil & Gas industry in any of the Hub meetings. Although I was informed that the O&G UK is represented within the management steering groups of Net Gain, it does appear that a sector with significant existing and future infrastructure requirements in the Southern North Sea has not been represented.

We look forward to continued input to the Net Gain project in the future and also the opportunity to comment on the draft MCZ Impact Assessments on the 24th of October.

Yours sincerely



Chris Jenner  
Environment & Consents Manager  
SMart Wind Ltd

From: Northumberland Inshore Fisheries & Conservation Authority

Sent: 28 July 2011 16:45

To: info@yhsg.co.uk

Subject:

MH/pr

Dear Net Gain Team

Thank you for providing a very constructive forum for debate and progress at the KC Stadium last week. Particularly on behalf of myself and our main participating officer in the Project, Deputy Chief (Environmental) IFCO Jon Green, I would like to acknowledge the hard work and commitment which has been shown by the team to this project to deliver the schedule of proposed MPAs on time. Your accessibility and the transparency of the process in particular has been noteworthy.

Unfortunately, the project has had to be pushed through at too fast a rate and while "best scientific knowledge" was used this was often inadequate and at a poor confidence level. Before the sites were put forward, it would have been better if superior research had been employed, even if that caused delays and there would have then been the potential for greater stakeholder support. That does not detract from the good work of the Net Gain team however but there will inevitably be a residue of frustration at the speed of the process.

There is also a certain amount of annoyance amongst stakeholders generally at broad areas of interest being identified early on and not revisited when considering sites for recommendation. Once again, it is understood that the timeframe was short and reconsidering these sites would have delayed the procedure but the result is that it may be the best sites have not been proposed.

The fact that socioeconomic factors were considered when proposing sites was important and we feel this allowed for greater consensus whilst not significantly (if at all) reducing the quality and diversity of the sites. It was also important to have the participation of individuals from other countries, ensuring that when management issues are concerned for offshore sites then a proper range of views have been heard.

Regarding specific sites in or adjacent to the Northumberland IFCA district:

(a) NG13 and 13A – we feel it is fair to report a feeling of inequity amongst the fishing industry in our district because the whole of the Northumberland coast is either covered by current MPAs or proposed new MCZs, whilst south of the Tyne that is not the case. There should have been more consideration of additional proposed MCZs south of the Tyne which would also have helped with connectivity of the site. Whilst it is noted that the whole of this site is within our district and that management is recommended to "maintain", currently NIFCA has several byelaws preventing over-exploitation of this area which it is felt at this stage will adequately ensure that there is no degradation of the habitats for which the site has been nominated. As an Authority we record details on the level of fishing throughout this site on a regular basis and would consider additional byelaw provision to protect this site as and when that becomes necessary.

(b) NG14 (south) – it is welcome that this site has not been forwarded for consideration at this time for inclusion. Within the remaining portion of NG14, the small area of mud has had designation that it should be managed to recover. This in effect potentially means no trawling and extrapolating this management measure into NG14 (south) would result in severe restrictions being placed on trawling within the Farne Deeps fishing area. This is probably the most important nephrops fishing

area in the region and therefore any future inclusion of NG14 (south) would be unlikely to receive support from the fishing industry or members of NIFCA. If any restrictions were in place this would almost certainly result in a displacement of effort which would have an extreme impact on other trawling areas. It is accepted that adequate "mud habitat" has not been forwarded as a proposed MCZ but we would put forward the view that as additional "mud habitat" does exist elsewhere within the Net Gain area, then such other habitat should be considered.

(c) NG15 and 16 – from the NIFCA perspective these sites are felt to be satisfactory on an ongoing basis.

(d) RA11 – this intertidal site will also be problematic as a reference area as preventing public access to this site will be difficult if not impossible (and also potentially illegal). It is however a site which is visited by few members of the public due to its remote location and management of the site will probably be best achieved by establishing a Code of Conduct and signage – enforcing legislation in the area would be extremely difficult. The boundaries of this site also need confirming as several potential boundaries have been considered without absolute agreement – these could be neap, average or spring tide limits, but all have major issues associated with them.

We hope that the above feedback is of further assistance and we look forward to seeing the final regional project report. Please don't hesitate to contact us if we can be of further assistance.

Yours sincerely

M.H. Hardy

M.H. Hardy LLB, Chief Executive

Northumberland Inshore Fisheries & Conservation Authority

Unit 60B, South Nelson Road

Cramlington

Northumberland NE23 1WF

Tel. 01670 731 399

Fax 01670 731 639

Email [nifca@nifca.gov.uk](mailto:nifca@nifca.gov.uk)

Website [www.nifca.gov.uk](http://www.nifca.gov.uk)

This message is intended for the use of the addressee only and may contain confidential or privileged information. If you have received it in error please notify us and destroy it.

All efforts have been made to ensure that this email and any attachments are virus free.