

Forewind Ltd
Melissa Read
Davidson House

Your ref

Our ref

13/1709

Date

12.06.2013

Dogger Bank Creyke Beck offshore wind farm – final pre-application consultation

We refer to your letter of 17 April 2013 with invitation to give remarks on the above mentioned project.

The project has been on public consultation in Norway in the period 29.04-01.06.2013. The Norwegian Coastal Administration, The Norwegian Directorate of Fisheries and The Norwegian Fishingwessel Owners Organisation have given the following remarks.

The Norwegian Coastal Administration are concerned with the safety and efficiency of navigation in the operational phase of the wind farm. It is the Coastal Administration's understanding that 500 metre safety zones can be established around wind farm installations in accordance with Article 60 in the United Nations Convention on the Law of the Sea. Further there are measures, such as an "Area to be avoided", that can be implemented in accordance with the International Maritime Organization's (IMO) General provisions on ships' routing. The concept proposed for use within the Dogger Bank Zone, "Charted Advisory Safety Areas" is probably less known to mariners than measures in the IMO provisions, and their legal basis may be unclear. An advantage by having a measure adopted by IMO, may be that these are promulgated by an IMO circular and binding for all member nations. It follows from the consultation that vessels will have a high tolerance and adaptability to the impact of the Dogger Bank Creyke Beck A, B wind development. We find this to be credible, but would like to point out that a further development of wind farms on part of or on the whole of Dogger Bank will have an adverse effect on vessel traffic unless there are established "shipping routes" that are broadly acceptable (cfr. Maritime and Coastguard Agency - Marine Guidance

Note 371).

The Norwegian Directorate of Fisheries are content with the dialogue with concerned fishing interests during the process and the modifications in the project to avoid the most important fields of small sandeel. Dogger bank is an important fishing area and a wind farm of this size will, in the Directorate's view, have impacts on the practice of fishing, and The Directorate expect that this dialogue will continue. The Directorate suggest follow up examinations with regard to co-existence of the two industries.

The Norwegian Fishingvessel Owners Organisation has been involved in the planning since the project was announced. The work has been done in close cooperation with the The Organisation of Danish Fishers and the Danish Directorate of Fisheries that have produced data on fisheries. With reference to the information in the documentation and signals given by Forewind in meetings, The Norwegian Fishingvessel Owners Organisation is so far content with the strategy and project.

The Norwegian Ministry of The Environment suggests that the impact from this wind farm on possible long range migration routes for birds are assessed in context with the same assessment for other possible wind farm developments in relevant distance to seize possible cumulative impacts. We further await a formal consultation from your Planning Inspectorate later this year on the application of the project, according to the EIA Directive/Espoo Convention.

Yours sincerely,

Erik Vieth Pedersen
Deputy Director General

Jørgen Brun
Senior Adviser

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Norwegian Coastal Administration
Norwegian Directorate of Fisheries
Norwegian Ministry of Fisheries and Coastal Affairs
The Norwegian Fishingvessel Owners Organisation