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# Trinity House

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**Registration Identification Number 10031143.**

14 July 2015

Dear Sir/ Madam,

**Re: EN010053 – HORNSEA (ROUND 3, ZONE 4) OFFSHORE WIND FARM:  
PROJECT TWO**

Thank you for your letter of 22 June (reference EN010053).

Trinity House is the General Lighthouse Authority (GLA) for England, Wales, the Channel Islands and Gibraltar. Trinity House is a corporation established by Royal Charter, and its powers as a GLA are principally derived from the Merchant Shipping Act 1995, as amended. Our primary role is to deliver a reliable, efficient and cost-effective aids to navigation service for the benefit and safety of all mariners commensurate with the level of risk. This includes the superintendence and management of all lighthouses, buoys and beacons within our area.

Responses to first round of written questions.

With regard to the first round of written questions we would comment as follows:

FNA12	a	This is an MCA requirement and therefore we have no comments to make.
	b	This is a decision for the applicant to make and any application should be made to DECC.
	c	Trinity House has not been made aware of any proposed bridge links at this stage and would request further details from the Applicant.
FNA13		Trinity House is unaware of any new traffic routes in the vicinity of this proposed development and is content that the baseline data is an accurate reflection of current conditions.
FNA14		Unfortunately, as we do not currently know the final layout of this wind farm, we cannot say whether the assessment presented represents the worst case scenario but we do accept that this is a likely worst case collision and allision scenario for assessment purposes for marine traffic. The conditions of the dMLs will allow us to determine whether a particular layout poses an unacceptable risk to mariners.
FNA15		This very much depends on the final layout design but the conditions of

	<p>the dMLs should:</p> <ol style="list-style-type: none"> <li>1. allow us to determine whether a particular layout poses an unacceptable risk to mariners; and</li> <li>2. allow us to not only agree a suitable layout but also to specify the required risk mitigation measures in order to reduce the risk to marine vessels to ALARP.</li> </ol>
FNA20	<p>Once the final layout has been agreed Trinity House will assess traffic patterns in the area and will direct the aids to navigation requirements for this site (as provided for in the conditions of the dMLs). It is unlikely that we will specify a Racon for the SW corner due to the poor conspicuity of Racons on radar screens in and around wind farm sites, however additional aids to navigation may be required and will be specified by Trinity House in due course.</p>

Please note: our comments in relation to questions FNA12, FNA13 and FNA14 are made on behalf of the Marine Management Organisation at the request of the MMO.

Standard Navigation Conditions for dMLs.

Trinity House, MCA, and MMO have previously agreed standard navigation conditions for inclusion in dMLs for offshore renewable energy installations (reproduced below for information). These were provided to the Applicant in March 2015 by the MMO. Trinity House's preference would have been to have used the standard navigation conditions in the dMLs for this project.

The Applicant has been reluctant to copy the standard navigation conditions into the dMLs and has chosen to make several adjustments to the conditions of previous dMLs. The Applicant and Trinity House, MCA and MMO have now agreed revised conditions in the dMLs for this project and are satisfied with the wording of the revised dML conditions.

Trinity House wishes it to be noted that in future we would prefer to use the standard navigation conditions, and if minor adjustments are required, we would prefer to use the standard navigation conditions as the starting point for discussions. We believe this would be a more efficient process than the way in which it has been done in this case where the starting point has been the conditions of previous dMLs.

Yours faithfully,

**T.L. Arculus LLB(Hons) MRICS**  
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**Standard navigation conditions for inclusion within Deemed Marine Licences (DML) for offshore renewable energy installations. Agreed by Marine Management Organisation (MMO), Trinity House and Maritime Coastguard Agency (MCA) on Jan 2015.**

**Notifications and Inspections:**

- 1) The undertaker must inform the MMO Coastal Office in writing at least five working days prior to the commencement of the licensed activities or any part of them.
- 2) The Kingfisher Information Service of Seafish, must be informed by email details of the vessel routes, timings and locations relating to the construction of the authorised scheme or relevant part to [kingfisher@seafish.co.uk](mailto:kingfisher@seafish.co.uk) :-
  - a) At least two weeks prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;
  - b) On completion of all offshore activities

Confirmation of notification must be provided to the MMO.

- 3) The undertaker must ensure that a notice to mariners is issued at least 10 working days prior to the commencement of the licensed activities or any part of them advising of the start date of each Work No.(?) and the expected vessel routes from the local construction ports to the relevant location.
- 4) The undertaker must ensure that the notices to mariners are updated and reissued at weekly intervals during construction activities and within five days of any planned operations and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA in accordance with the construction program approved under **condition <insert>**. Copies of all notices must be provided to the MMO.
- 5) The undertaker must notify the UK Hydrographic Office of both the commencement (within two weeks), progress and completion (within two weeks) of the authorised scheme in order that all necessary amendments to nautical charts are made and the undertaker must send a copy of such notifications to the MMO.
- 6) In case of damage to, or destruction or decay of, the authorised development seaward of MHWS or any part thereof the undertaker shall as soon as possible and no later than 24 hours following the identification of damage, destruction or decay, notify MMO, MCA Trinity House and the UKHO.

## **Pre-construction plans and documents:**

The authorised development shall not commence until the following have been submitted to and approved by the MMO. Each programme, statement, plan, protocol, scheme or other detail required to be approved under this condition must be submitted to the MMO for approval at least four months prior to the commencement of the authorised development.

- 1) A plan to be agreed in writing with the MMO following appropriate consultation with Trinity House and the MCA setting out proposed details of the authorised development, including the:
  - a) number, dimensions, specification, foundation type(s) and depth for each WTGs, offshore platforms, substations and meteorological masts;
  - b) the grid coordinates of the centre point of the proposed location for each WTG, platform, substation and meteorological mast;
  - c) proposed layout of all cables; and
  - d) location and specification of all other aspects of the authorised development.
- 2) An Aids to Navigational Management Plan to be agreed in writing by the MMO following appropriate consultation with Trinity House specifying how the undertaker will ensure compliance with conditions (1) to (5) of '**Aids to Navigation**' from construction and for the lifetime of the project.

No part of the authorised scheme may commence until the MMO, in consultation with the MCA, has given written approval for an Emergency Response and Co-operation Plan (ERCoP) which includes full details of the ERCoP for the construction, operation and decommissioning phases of that part of the authorised scheme in accordance with the MCA recommendations contained within MGN371 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues".

- 3) No part of the authorised scheme may commence until the MMO, in consultation with the MCA, has given written approval for an Emergency Response and Co-operation Plan (ERCoP) which includes full details of the ERCoP for the construction, operation and decommissioning phases of that part of the authorised scheme in accordance with the MCA recommendations contained within MGN371 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues". The ERCoP and associated guidance and requirements must be implemented as approved, unless otherwise agreed in writing by the MMO in consultation with the MCA.

## **Aids to Navigation:**

- 1) The undertaker shall during the whole period of the construction, operation, alteration, replacement or decommissioning of the authorised development seaward of MHWS exhibit such lights, marks, sounds, signals and other aids to navigation, and to take such other steps for the prevention of danger to navigation as directed by Trinity House.
- 2) The undertaker must keep Trinity House and the MMO informed of progress of the authorised development seaward of MWHS including:
  - a. notice of commencement of construction of the authorised development within 24 hours of commencement having occurred;
  - b. notice within 24 hours of any aids to navigational being established by the undertaker; and
  - c. notice within 5 working days of completion of construction of the authorised development.
- 3) The undertaker must submit reports quarterly to Trinity House detailing the working condition of aids to navigation. Reports may be submitted more frequently as specified by Trinity House.

- 4) The undertaker must notify Trinity House and the MMO of any failure of the aids to navigation including timescales and plans for remedying such failures, as soon as possible and no later than 24 hours following the detection of any such failure.
- 5) Should condition (6) of '**Notifications and Inspections**' be invoked, the undertaker must lay down such buoys, exhibit such lights and take such other steps for preventing danger to navigation as directed by Trinity House.

**Colouring of structures:**

- 1) The undertaker must paint all structures as part of the authorised development seaward of MHWS yellow (colour code RAL 1023) from at least HAT to a height as directed by Trinity House. Unless the MMO otherwise directs, the undertaker must paint the remainder of the structures submarine grey (colour code RAL 7035).

**Separate provision**

- 1) No part of the authorised scheme may commence until the MMO in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the development, adequately addressed all MCA recommendations as appropriate to the authorised scheme contained within MGN371 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues" and its annexes.