



TRINITY HOUSE

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Application by Orsted Hornsea Project Three (UK) Ltd for an Order granting  
Development Consent for the proposed Hornsea Project Three Offshore  
Wind Farm**

5<sup>th</sup> November 2018

Dear Examining Authority

We, Trinity House (“TH”), note the document dated 9<sup>th</sup> October 2018 detailing the questions laid out by the Planning Inspectorate. Whilst the ExA have not directed any questions to Trinity House, we respectfully request that our comments are given due consideration throughout the examination process.

Find our answers to Q1.5.4, Q1.13.64, Q1.13.66 and Q1.13.67 below. Please be aware that our answers should be read in conjunction with the response provided by the MCA.

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**QUESTION Q.1.5.4: The MCA [RR-060] considers that the 150m tolerance referred to in Principle 8 of the Layout Development Principles [APP-091] is excessive and would impede search and rescue (SAR) 52 coverage. What would the MCA regard as an acceptable tolerance?**

ANSWER: TH consider the stipulated 150m tolerance to be excessive. A development lane of 300 metres is somewhat unworkable for TH, when working towards agreeing a final layout with the developer and subsequently providing advice to the MMO. In order to assist safe marine navigation; including search and rescue craft, TH submit that a tolerance of 50m should apply.

**QUESTION Q1.13.64: Condition 6 provides for aids to navigation. The MoD [RR-086] has commented that the DML should ensure that aviation warning lighting will be fitted to relevant**

**offshore structures for the duration of the construction and operation of the scheme. Does the drafting of this condition meet your concern relating to aviation warning lights?**

**If not, what alternative drafting would you suggest?**

ANSWER: TH submits that Condition 6 should not reference MoD / Defence Infrastructure Organisation Safeguarding. We suggest that the standard wording, as set out below, is used instead:

“ The undertaker shall during the whole period from the commencement of construction of the authorised project to the completion of decommissioning exhibits such lights, marks, sounds, signals and other aids to navigation, and to take such other steps for the prevention of danger to navigation as Trinity House may from time to time direct”

**QUESTION Q1.13.66 and Q1.13.67:**

**Condition 11(1)(a) states that the approval of the MMO shall not be required where the proposed design is in accordance with the design principles. The MMO [RR-085] objects to that approach. Please comment on the MMO’s objection to this aspect of the condition.**

**Condition 11(1)(a)(v) provides for the indicative layout of the WTGs to be approved. Why would the layout only be indicative? At what stage (if any) would the MMO approve the actual layout?**

ANSWER: We do not agree with Condition 11(1)(a). The final layout should be agreed by the MMO, who would consult with the MCA and TH accordingly. We suggest that the standard wording, as set out below, is therefore incorporated:

“ A plan to be agreed in writing with the MMO following appropriate consultation with Trinity House and the MCA setting out the proposed details of the authorised project, 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 project.”

Please email [mariam.nagdi@trinityhouse.co.uk](mailto:mariam.nagdi@trinityhouse.co.uk) and [navigation.directorate@thls.org](mailto:navigation.directorate@thls.org) if you have any questions regarding the content of this letter.

We look forward to participating in the next stage of the process.

Yours faithfully,

**Mariam Nagdi**  
Legal Advisor  
Legal & Risk Department