

OUR REF VML/KLH/SPI35.4
YOUR REF

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

BY EMAIL TO: HornseaProjectThree@pins.gsi.gov.uk

7 November 2018

Dear Sirs

**HORNSEA PROJECT THREE OFFSHORE WIND FARM DCO
OUR CLIENTS: SPIRIT ENERGY NORTH SEA LIMITED; SPIRIT ENERGY RESOURCES LIMITED; SPIRIT ENERGY NEDERLAND B.V.**

We are instructed by our clients Spirit Energy North Sea Limited (UK Company Number: 04594558), Spirit Energy Resources Limited (UK Company Number: 02855151) and Spirit Energy Nederland B.V. (Company Number: 34081068) operating together under the 'Spirit Energy' trading name in respect of the above Project.

Relevant representations were submitted on behalf of the three Spirit entities in relation to the Project on 20 July 2018. These representations were in near identical terms but three separate representations were submitted in case any differences in terms of the impacts of the Project on each of the three entities became apparent during the Examination process.

Written representation

At this time, our clients consider that the impacts of the Project are similar across the assets owned and operations undertaken by each of the entities. Accordingly, one written representation with expert reports and supporting documents has been prepared but it is submitted on behalf of all three Spirit Energy Interested Parties.

This representation comprises the following documents submitted by email:

- This cover letter dated 7 November 2018
- Answers to Examining Authority's Questions Q.1.5.7 (annexed to this cover letter)

ABERDEEN • EDINBURGH • GLASGOW • BRUSSELS

Brodies LLP is a limited liability partnership, registered in Scotland. Registered no. SO300334.
Registered office: 15 Atholl Crescent, Edinburgh, EH3 8HA. A list of all members is available for inspection at 15 Atholl Crescent Edinburgh EH3 8HA. 'Brodies' is a registered trade mark.

**Edinburgh Office:
Brodies LLP Solicitors**
15 Atholl Crescent
Edinburgh EH3 8HA,
Scotland UK

Tel: [+44] (0)131 228 3777
Fax: [+44] (0)131 228 3878
DX ED10, EDINBURGH-1

43618671v1

- Written Submission by Spirit Energy (plus a redacted copy)
- Inventory of Supporting Documents
- Supporting Documents
- AviateQ International Limited – Flight Evaluation Report (commissioned by Spirit Energy to assess aviation impacts of the Project)
- Noble Denton Marine Services – Hornsea 3 Windfarm Review of Marine Hazards (commissioned by Spirit Energy to assess shipping and navigation impacts of the Project)

Redaction

Within our clients' representation it has been necessary to include details relating to Spirit Energy's commercial operations in order to fully explain the impacts of the Project and provide justification for the protective provisions proposed within the representation. As some of this information is confidential, a redacted copy of the written representation has been prepared to allow for publication on the PINS portal.

For completeness a version of the written representation without redaction has also been provided. We should be grateful if you would contact us before publishing or otherwise providing copies of the unredacted representation to a party other than the Examining Authority.

Supporting Documents

Within our clients' representation it has also been necessary to provide references in support of their position, rather than copies of the primary sources, where our clients are not clear that they have the necessary permission to do so in terms of copyright. In case the Examining Authority requires copies of the undernoted sources, we are endeavouring to obtain the necessary permissions so that we may submit copies in due course. The affected sources are:

- Operator's Aircraft Operations Manuals: (1) CHC's document: "AW139 Operations Manual" and EC155B1's document "EC155B1 Rotorcraft Flight Manual" (which are relevant to and cross-referenced in AviateQ International Limited – Flight Evaluation Report: Proposed Hornsea Three Offshore Wind Farm (October 2018))
- Interaction Between Offshore Wind Farms and Maritime Navigation, The World Association for Waterborne Transport Infrastructure (2018).

Participation in Issue Specific Hearings

Our clients' consider that the impacts of the Project on their operations (relating principally to the areas of shipping and navigation and aviation) remain of a complex and technical nature. Their provisional view is that such issues would benefit from oral presentation at issue specific hearings.

The two hearings that appear most relevant to our clients' representation are:

Tuesday 4 December 2018 (which includes discussion of navigation/other offshore operations); and
Thursday 6 December 2018 (which includes discussion on the draft DCO).

Our clients note the correspondence received earlier today from PINS indicating that Interested Parties should confirm whether they wish to participate by Monday 26 November 2018. We will provide a final confirmation regarding our clients' wish to participate by that date.

If you require any further information in relation to the written representation submitted on behalf of Spirit Energy, please contact Victoria Lane in our Edinburgh office: DDI: 0131 656 0127 or at victoria.lane@brodies.com.

Yours faithfully

A large black rectangular redaction box covering the signature of the sender.

On behalf of Brodies LLP

ANSWERS TO Q 1.5.7 ON BEHALF OF SPIRIT ENERGY (SPIRIT ENERGY NORTH SEA LIMITED; SPIRIT ENERGY RESOURCES LIMITED AND SPIRIT ENERGY NEDERLAND B.V.)

1. *Please provide further detail about the specific assets which are of concern and their respective distances from the proposed windfarm?*

Further detail about Spirit Energy's specific assets and their respective distances from the proposed windfarm are set out at sections 2.2 – 2.5 of their written representation dated 7 November 2018.

2. *How do those distances compare with other installations operated by Spirit Energy in the vicinity of offshore windfarms?*

An explanation as to how those distances compare with other installations operated by Spirit Energy in the vicinity of offshore windfarms is set out at section 4.6 and figure 2 of their written representation dated 7 November 2018.

3. *What further mitigation measures do you consider to be necessary?*

The further mitigation measures that Spirit Energy considers necessary are set out in the annex to their written representation dated 7 November 2018.