



Kate Mignano
Case Manager
Planning Inspectorate
(Email only) ThanetExtension@pins.gsi.gov.uk

3 December 2018

Dear Kate Mignano

Planning Act 2008 (as amended), Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) Rule 6

On 9 November 2018, the Marine Management Organisation (MMO) received the Rule 6 letter notice under section 88 of the Planning Act 2008 for invitation to preliminary meeting and proposed timetable for examination of the application for Thanet Extension Offshore Wind Farm (OWF).

Please find the MMO's response for your consideration outlined below:

1. Preliminary Meeting and Issue Specific Hearing 1 (ISH1) – International Issues

The MMO will **not** be attending the Preliminary Meeting or the ISH 1 Tuesday 11 December 2018. However the MMO has reviewed the draft timetable for the examination of the application and would like to highlight the following concerns for consideration by the Examining Authority (ExA).

Due to time required to travel to the hearing location and the Thanet Extension examination process running concurrently with Norfolk Vanguard (EN010079) one day apart, along with Hornsea Three (EN010080) examination process already underway, the MMO is concerned with overlaps across the projects with competing deadlines and hearing attendance. The MMO and its specialist advisors, Centre for Environment, Fisheries and Aquaculture Science (Cefas) have individuals providing specialist advice working to all three above projects in the examination process and is concerned that it will not be possible to participate fully in all three examinations and provide the detailed responses required. The MMO would like to make the following suggestions to the proposed timetable:

- 1.1. The MMO requests the ISH hearings are organised to minimise the need for MMO to be in attendance, (e.g. into offshore matters and onshore matters). This would benefit travel arrangements and resources with better utilised time, allowing for an efficient and effective examination.

- 1.2. All written deadlines are 12 noon. The MMO requests that deadline dates are extended to midnight, as has generally been seen for NSIP project deadlines. This will give extra time within the working day to provide responses and ensure the necessary quality checks have been undertaken.
- 1.3. The MMO notes that deadline 1 for both Thanet Extension and Norfolk Vanguard are placed over the Christmas period where the organisation experiences reduced resource capacity to respond. Deadline 1 also coincides with deadline 1 for Norfolk Vanguard. Given this, combined with the resource constraints set out above, the MMO requests that the ExA considers a two week extension to deadline 1.
- 1.4. ISH 3- 7. Based on the draft time table, MMO attendance would be currently be required from Tuesday morning on the 19 February 2019 to the afternoon of Thursday 21 February 2019. The MMO representatives are based in Newcastle upon Tyne and experience significant travel time to be able to attend the hearings. The MMO requests that consideration is given to holding ISH5 and CAH1 after ISH7 (the DCO hearing), this would allow MMO additional working day to work on deadline 3, which currently is 7 working days following ISH7. This would also reduce pressure on resources who will be expecting to receive Norfolk Vanguard ExA's second written questions on 20 February 2019.
- 1.5. ISH 8-9. The MMO requests that these two ISH are held on the same day, rather than either side of the Open Floor Hearing 2 (OFH2) and CAH2. As above, (point 1.3, ISH 3-7) this would allow for more efficient use of available time.
- 1.6. Currently ISH 9 is the afternoon of 25 April 2019. Potentially the MMO representatives may have to travel back on Friday 26 April 2019. This would then allow for only one working day for deadline 5 which is noon on Tuesday 30 April 2019. If this deadline could be extended this would assist the MMO's ability to respond fully.
- 1.7. Deadline 7 is currently 4 working days from Deadline 6 which may be challenging depending on the volume of work that will be required. The MMO requests the ExA considers extending this to 7 or 10 June 2019 if possible.

2. Issue Specific Hearing 2 (ISH 2) - Maritime, Shipping, Navigation and Safety Issues at 10.00am on Wednesday 12 December 2018

- 2.1. The MMO confirms attendance of Lisa Southwood and Adam Suleiman at ISH2. The MMO does not have specific points to raise, as generally defer to navigation safety bodies for matters of shipping and navigation safety. The MMO notes the ExA position to obtain an integrated understanding of the issues and additional mitigation measures that may be developed or proposed, and therefore may wish to respond to any comments directed towards the MMO. The MMO will have interest in any proposed changes to the DML or further mitigation measures that may be required to be secured within the DML.

Yours sincerely,

Margaret Tierney
Marine Licensing Case Officer

D 02080 265360
E margaret.tierney@marinemanagement.org.uk