



TRINITY HOUSE

14 January 2019

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Your Ref: RE: EN010084
Identification No. 20012441

The Thanet Extension Offshore Wind Farm

Dear Sir / Madam

Further to the application relating to the Thanet Extension Offshore Wind Farm, we wish to provide our further responses as follows in relation to Deadline 1-

Response to Issue Specific Hearing 2 (ISH2) : 12 December 2018 Shipping, Navigation and Maritime Safety Issues

Trinity House submits its Written Summaries of the Oral Submissions at the above ISH as follows:-

Captain Roger Barker, Director of Navigational Requirements, spoke on behalf of Trinity House specifically at agenda item 4 of ISH2. Captain Barker gave an overview of his experience as a master mariner, within Trinity House and how he presents on risk internationally for the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA).

It was stated that we support Offshore Renewable Energy initiatives in principle but must ensure that all developments are fully assessed in relation to maritime safety. This must also take into account the qualitative data as well as the quantitative. The existing Thanet Offshore Wind Farm was referenced as being a good example of how interaction between all stakeholders led to safe operational conditions being established.

Trinity House object to the proposed red line boundary (RLB) as it will restrict the available sea room for marine traffic between the wind farm and the Kent coast. Shipping will naturally move away from wind turbines and this cannot be shown in the quantitative data, therefore qualitative data must also be considered when considering the RLB. It is also

noted that the RLB does not take into account any construction or operational safety zones which would be applied for at a later date and could restrict traffic further.

It is our position that the Navigation Risk Assessment (NRA) is good but we disagree with the final conclusion that the risk can be sufficiently mitigated to an acceptable level. The increase in risk to 1 accident in 4.5 years does not take into account the qualitative data that the number of vessel movements at any one time is unknown as the quantitative data will average this out over the required time frame. We therefore think this level of risk is unacceptable.

It is also our opinion that the reliance of AIS data within a quantitative assessment should be viewed with caution. Not all vessels carry AIS and vessels have been known to turn their AIS off, in particular fishing vessels. In certain areas AIS can be sporadic if collected from shore based equipment. These factors are also noted within the applicants NRA.

It is also stated that the area between the RLB and Kent Coast is one of general navigation where vessels will be operating on passage and as such may have the bridge manned with a single officer and an unmanned machinery space etc. It is also likely that vessels will not have a pilot or pilotage exemption holder on the ships bridge at this time.

Trinity House have a statutory duty to mitigate risk in areas of general navigation and we cannot adequately do that in this area with aids to navigation. If any additional aids to navigation are placed between the proposed RLB and coast this would restrict traffic further.

We are also concerned on the restriction of available sea room for navigation as the unpredictability of recreational and fishing vessels will also be a concern for vessels transiting the area.

In answer to a specific question on the effect of an offshore wind farm on marine radar Captain Barker referenced the 2009 study and reports from Deep Sea Pilots. It is noted that the effect can be significant depending on the size and arrangement of the vessels involved. This is another example of data which is qualitative and cannot be quantified.

It is stated that the current Drill Stone buoy is keeping marine traffic away from the bank and not the current wind farm. As this buoy has been in situ for a long period of time it is proof of how aids to navigation successfully work.

Regarding the specific question concerning additional security for navigation safety in the Deemed Marine Licence, it is our opinion that these are sufficient to allow us, and the applicant, to review and alter the aids to navigation throughout the lifespan of the project as required. Moreover the drafted conditions allow us to direct the applicant to take necessary steps to prevent any danger to navigation should a reduced RLB be agreed.

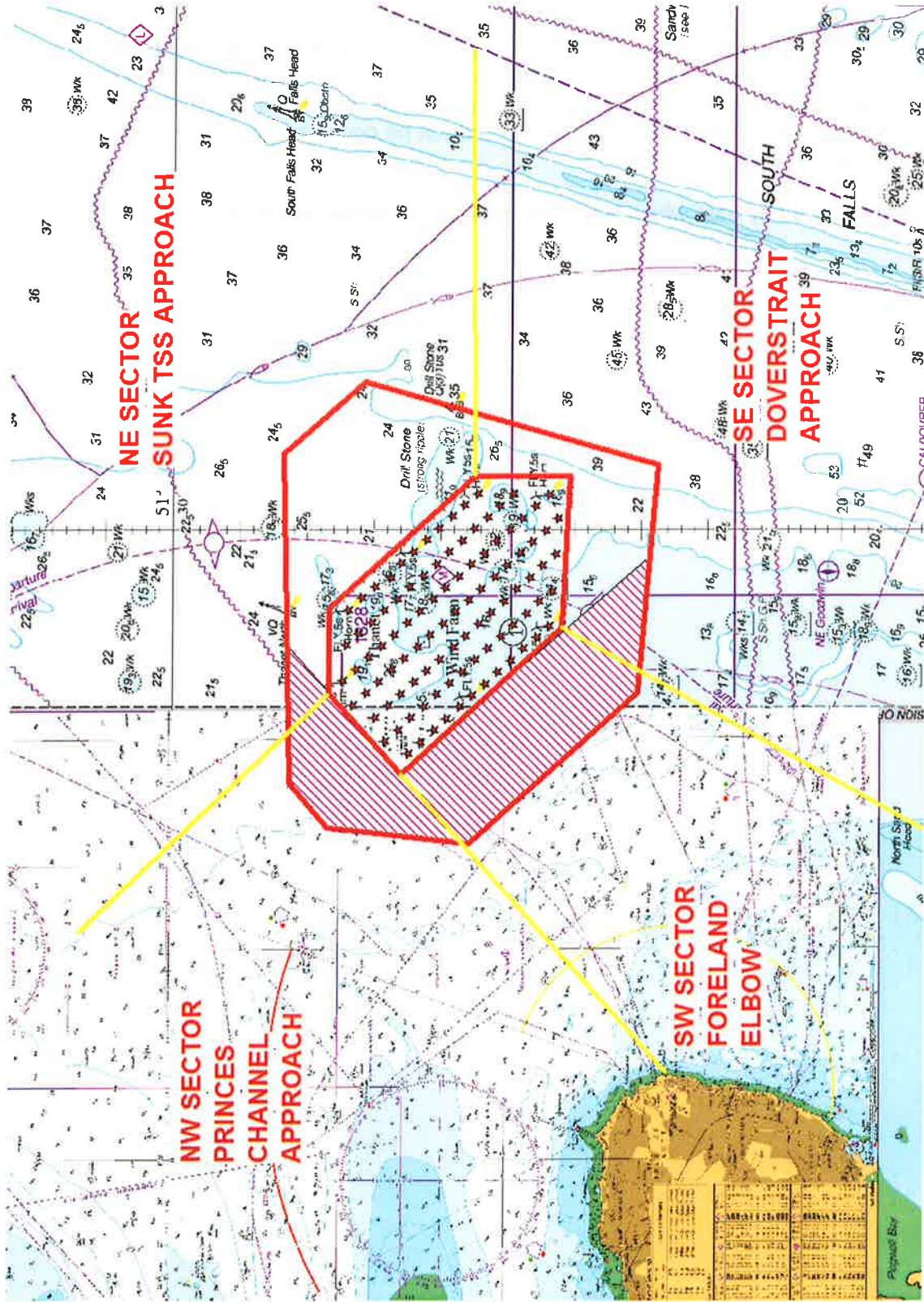
In answer to a specific verbal question we stated the reliance on communication between the project and marine traffic as a mitigation measure needs to be assessed with caution. The applicant would be responsible for any communication surrounding the project and this could take the form of Notices to Mariners and Radio Broadcasts. The applicant is then reliant on the marine user actually receiving the communication, reading it and taking appropriate action.

The applicant would have no control over the marine traffic in areas of general navigation and it is our opinion that it would be unlikely that any third party would be able or willing to undertake this role.

Hearing Action Points 7 and 11 refer to the red line boundary proposal. Trinity House object to the current proposal and attach our preferred solution below. Our preferred solution takes into account the worst case scenario of turbines being placed on the RLB, and possible 500m safety zones during construction and at various times throughout the operational phase, extending beyond the RLB. We do not consider that the additional risk created by the proposed RLB to vessels navigating between the offshore wind farm and coast can be adequately mitigated and certainly not through the deployment of aids to navigation.

The "PLA Cooperation Plan mentioned in **Action Point 12** was a mitigation measure proposed at an early stage which we could not agree with as this would need to be accepted by all parties and written into legislation for it to be considered suitable. It is our opinion that any voluntary agreements for mitigation should not be considered as they could be removed at any time by either party.

Trinity House does not hold any data which would be relevant for **action point 18**.



Area requested to be removed from Red Line Boundary

For the benefit and safety of all mariners
www.trinityhouse.co.uk
 The Corporation of Trinity House is a Registered Charity

Trinity House
 Tower Hill
 London
 EC3N 4DH

Notification of Future Issue Specific Hearings

Trinity House confirms that it continues to wish to attend and speak on maritime shipping, navigation issues and on the draft DCO at appropriate future Issue Specific Hearings in relation to this application.

Please address all correspondence regarding this matter to myself at russell.dunham@thls.org and to Mr Steve Vanstone at navigation.directorate@thls.org

Yours faithfully,

A black rectangular redaction box covers the signature of Russell Dunham. A thin, dark line extends from the top right corner of the box, likely representing the end of a handwritten signature.

Russell Dunham ACII
Legal & Risk Advisor

Email: Russell.dunham@thls.org