

**INFRASTRUCTURE PLANNING**

**THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010**

**THE THANET EXTENSION OFFSHORE WIND FARM ORDER**

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**Summary of Written Representations submitted on behalf of Estuary Services Limited**

(Rule 8 letter 18 December 2018)

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**Summary of Witten Representations on behalf of Estuary Services Limited (“ESL”) in respect of an application for Development Consent submitted by Vattenfall Wind Power Limited (“the Applicant”) for the Thanet Extension Offshore Wind Farm Order (“the DCO”)**

- 1.1 ESL is a company with the company number 02262789, with registered office at Maritime Centre, Port of Liverpool, L21 1LA. ESL is jointly owned by the Port of London Authority (“the PLA”) and [the Port of Sheerness Ltd (Part of Peel Ports Operations Limited).
- 1.2 ESL provides pilot boarding and landing services which those ports are required to provide. The proposals under the dDCO are in close proximity to ESL’s boarding locations.
- 1.3 ESL does not object to in principle to an extension of the Thanet Offshore Wind Farm (“the Wind Farm”). However, the extent of the proposals to the south-west and north-west of the current Wind Farm pose a risk to navigational traffic, and the viability of two of its pilotage stations.
- 1.4 ESL considers that certain ships will divert their routes in order to maintain a safe distance from the Wind Farm. This will have economic consequences.
- 1.5 ESL does not accept the Applicant’s position that the inshore channel will be used by the same number of vessels after the Scheme is implemented. However, if that argument is accepted, this will inevitably lead to an increase in risk of vessel collisions.#
- 1.6 The Scheme will have an impact on ESL’s pilotage operations. It is ESL’s case that there will not be sufficient safe sea room at North East Spit pilot boarding station if the western expansion of the wind farm is permitted. The impact of this is for pilotage operations to be pushed out to either NE Goodwin or the Tongue. In addition, the location of the Tongue will need to be pushed further north, into less shelter waters. As well as safety implications, the movement of pilotage operations will have economic impacts.
- 1.7 ESL does not consider the identification, assessment and management of shipping and navigation risks in the Navigation Risk Assessment (document reference 6.4.10.1) (“NRA”) to be sound, nor is it compliant with Marine Guidance Note 543.

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- 1.8 There was a lack of engagement from the Applicant and although meetings were held and ESL expressed concerns about the reduction in sea room, the only resulting adjustment to the scheme by the Applicant does not address the PLA's concerns.
- 1.9 Additionally, ESL considers that the ExA should not rely on the conclusion of the Pilot Bridge Simulation (Document Reference 6.4.10.2) that the continuation of pilotage operations at the NE Spit pilot station is feasible.
- 1.10 The mitigation desired by ESL is a further reduction in the Red Line Boundary of the application at the Western boundary of the site.

**Winckworth Sherwood LLP**  
**Solicitors and Parliamentary Agents**  
**On behalf of Estuary Services Limited**  
**15 January 2019**