

From: [Helen Croxson](#)
To: ["Thanet Extension": Thanet Extension](#)
Cc: [Rakesh Pandit](#); [Peter Lawson](#); [Nick Salter](#); [Tony Evans](#)
Subject: Re: Thanet Extension OWF (EN010084) Deadline 4c
Date: 10 April 2019 15:42:42
Attachments: [image003.png](#)
[Thanet Extension Deadline 4C submission SEZ ExA.pdf](#)

Dear Examining Authority,

Please find attached response from MCA for deadline 4C. This includes notification of the MCA representatives at ISH 8.

Kind regards

Helen



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Please note I currently work Tuesdays, Wednesdays and Thursdays.



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Your ref: **20012643**

Our ref: Thanet Extension Offshore
Windfarm Project (EN010084)

10 April 2019

Dear Sir/Madam

Thanet Extension Offshore Windfarm Project (EN010084) - Written Representations at Deadline 4C

Thank you for the opportunity to make a representation at Deadline 4c with our statements to be made to inform Issue Specific Hearing (ISH) 8. The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved, and our search and rescue capability is maintained, whilst progress is made towards government targets for renewable energy.

We have been encouraged by the applicant's recent attempts to address concerns regarding the reduction of available sea room on the western extent, through the introduction of the Structures Exclusion Zone (SEZ). The MCA spent time during our recent meeting with the applicant confirming how a SEZ differed to an actual reduction to the redline boundary, from a consenting perspective. We noted that the SEZ allows for oversail/fly to occur outside the SEZ, which would not usually be the case for a red line boundary. In addition, we noted construction vessels, cables and wave buoys for example could all be placed outside of the SEZ.

The MCA is pleased to see that the applicant is working closely with the relevant Interested Parties (IP) at a local level to review the hazard scoring, and to address the qualitative assessment required to ensure the addendum NRA is representative of the real-life scenarios. The MCA attended the recent Hazard Workshop as an observer to ensure that our requirements as per MGN 543 are followed, to answer any MCA related questions, and to ensure that local navigation expert views were being taken into consideration, and assessed as part of the applicant's addendum to the NRA.

The MCA has reviewed the documentation submitted by the applicant at deadline 4B and feels that the introduction of the SEZ is an improvement, which does increase the amount of available searoom, and reduces the impact on the pilot boarding areas, to some extent. The MCA however remains concerned that there is no current



HM Coastguard

agreement between the IPs and the applicant, and would be keen to see these discussions progress until such time as when agreement can be reached on whether the risk is deemed ALARP with appropriate mitigation. The MCA does have comments on the addendum NRA with regards to mitigation, as it is not clear in this document which mitigations are embedded and which are additional risk control options for the increase in risk.

For example, the NRA lists 'Promulgation of Information' (including Navigation Hazards Charted, Notices to Mariners Issues) under the 'Risk controls specifically designed to mitigate the increase in navigation risk brought about by the TEOW', where as we would consider this embedded mitigation. Also, it states in paragraph 133 in the addendum NRA that a layout plan will be approved, as an embedded risk control. This will therefore need to meet MCA guidance in MGN543 i.e. it must minimise risks to vessels and SAR helicopters transiting through Thanet and Thanet Extension windfarms. However, optimising the layout symmetry is then also listed as an additional risk control.

It is therefore yet to be determined the extent to which the concerns regarding the reduction in available searoom on the western extent have been sufficiently mitigated, and we look forward to exploring this further through the Hearing and subsequent written representations. The MCA will continue to be involved in discussions with regards to its acceptability.

The MCA would also like to submit comments on the current draft Development Consent Order (DCO) in advance of the DCO hearing next week, with regards to Public Rights of Navigation, Arbitration, and our navigation safety/SAR related conditions.

Finally, the MCA would like to send the following representative to ISH8 if acceptable to the ExA:

- 1) Captain Rakesh Pandit, Nautical Policy Lead, MCA
- 2) Nick Salter, Navigation Policy Advisor, MCA
- 3) Tony Evans, HM Coastguard and SUNK VTS User Group representative

We hope you find this information useful as part of your Examination of the Thanet Extension.

Yours faithfully,

Helen Croxson
OREI Advisor, MCA