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Subject: Written Representations to Examining Authority following ISH 8 for Deadline 5 - Thanet Extension Offshore Wind Farm
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Attachments: [Thanet.pdf](#)

Dear Sir / Madam

Ref: EN010084

Identification No. 20012441

**Written Representations following ISH 8 to Examining Authority for
Deadline 5 - Thanet Extension Offshore Wind Farm**

Please find attached a letter from Trinity House dated 29 April 2019 concerning the above.

Kind Regards

Russell



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TRINITY HOUSE

29 April 2019

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

Your Ref: EN010084
Identification No. 20012441

The Thanet Extension Offshore Wind Farm Project Written Representations to the Examining Authority following ISH 8 for Deadline 5

Dear Sir / Madam

We refer to the above application for development consent. Trinity House attended ISH 8 (Environmental, Shipping, Maritime Fishing and other matters) on 16 & 17 April 2019.

Accordingly, Trinity House (TH) submits its Written Representations to the Examining Authority (ExA) for Deadline 5 as follows:-

Action Point Document EN010084-001770

Point 4: Policy Position on Sea Lanes or Routes.

Matters regarding formal routing measures fall within the remit of the flag state. In this case the Maritime and Coastguard Agency (MCA) together with the overarching Department for Transport (DfT) oversight. As such, it would be inappropriate for TH to comment on the specifics requested in the action with regard to National Policy Statements.

Point 5 Policy Considerations – EN-3 para 2.6.166.

TH recognise that mitigation for recreational craft is accommodated for within the layout design by ensuring multiple lines of turbine orientation would be provided together with ID marking and other Aids to Navigation as specified. TH note that the extinguishment of Public Rights to Navigation will only apply during construction and recreational craft, along with Fishing and commercial vessels, will be able to navigate within the site freely on completion of construction activities.

Point 10 Maritime and Coastguard Agency and Trinity House to submit a written copy of their oral submissions to ISH8 and observations on the workshops.

TH reaffirmed previous submissions that the areas indicated are those used for general navigation and that qualitative data should be used, along with quantitative data, when assessing the risks to be mitigated in the area.

TH stated that, in our opinion, the area between the Elbow Buoy and the array with the proposed Structure Exclusion Zone (SEZ) was adequate for passage under normal circumstances. It was also stated that the area around the NE spit was considered adequate for general navigation but we would not comment on pilotage operations as the pilots and pilot boat crews were best placed to answer on this. As contained within our previous submissions we mentioned the qualitative factor needing to be taken in to account.

TH raised concerns over what could actually be placed in the SEZ as this could reduce the available sea room in these areas.

TH raised a question on the Navigational Risk Assessment (NRA) and new Addendum (NRAA) about what should be considered appropriate during the construction, and any decommissioning, phase as the NRAA only cover the operational phase with the SEZ in situ.

At Workshop 1 all Interested Parties (IPs) were invited to express their views on the project. All IPs identified their areas of concern and the content from the meeting provided the Applicant the good reasons to submit the now proposed SEZ in the application.

At Workshop 2 all IPs in attendance were provided the opportunity to identify, discuss, and score relevant hazards. The applicants' original proposals were discussed and 18 main hazards identified for scoring. It is however notable that significant debate surrounding the scenarios and scoring led to only 4 hazards being considered. The scoring for these 4 hazards was on general consensus rather than agreement. Final scoring was not possible due to only 4 hazards being assessed and the remaining 14 completed by the applicant after completion of the workshop. TH did not engage with the applicant on these after the workshop by phone, although like other IPs we had been offered a teleconference.

At workshop 2 IPs did not discuss further mitigation proposals or possibilities as the time had been used on just 4 identified hazards.

Point 20 Updated simulation report.

The TH position on an updated simulation report is stated in Annex A of Document EN010084-001770 by the Examining Authority, and we still consider that if one is carried out it should be prior to the Secretary of State's decision. We also questioned what value an updated simulation report would bring to the application as we would still have concerns over very experienced personnel being used and limited scenarios trialled. These are the same concerns we have over the original simulation as stated previously and in meetings with the applicant.

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,


Russell Dunham ACII
Legal & Risk Advisor

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