

INFRASTRUCTURE PLANNING
THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010
THE THANET EXTENSION OFFSHORE WIND FARM ORDER

Response to further information requested by the ExA (Responses to Action Points from ISH8) submitted on behalf of the Port of London Authority and Estuary Services Limited

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7	<p>Risk Controls</p> <p>Port of London Authority to confirm in regard to the risk controls identified in Table 13 of the Navigation Risk Assessment Addendum: '<i>Risk Controls identified as part of PLA NRA Working Group 2015 on the Safety of Navigation in the North East Spit Area</i>' which controls (if any):</p> <ul style="list-style-type: none"> • have been adopted • have been definitively rejected 	<i>Port of London Authority</i>	<p>Below is the status of the risk controls adopted by the PLA.</p> <p>Those risk controls which were identified, but subsequently not taken forward, were given further consideration following the working group, but were not adopted as a result. The risk controls that were not adopted were deemed not to be cost effective at the time, or not necessary due to the residual risk scores, but were kept under consideration/review. The two final points on the list were identified in the Terms of Reference of the group, but did not evolve into specific risk controls during the course of the review. However, the PLA's powers and rules and regulations are subject to regular review.</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Recommended / Existing Risk Controls</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Additional advice in Admiralty products</td> <td>In Place</td> </tr> <tr> <td>Consider additional met sensors closer to NE Spit</td> <td>Not taken forward</td> </tr> <tr> <td>Coordination of Pilot cutter operations on VHF Ch 69</td> <td>In Place</td> </tr> <tr> <td>Enhanced Pilotage/PEC navigational guidance/lessons identified</td> <td>In Place</td> </tr> <tr> <td>ESL/PLA/MPA Pilot cutter scheduling and monitoring process</td> <td>In Place</td> </tr> <tr> <td>Planning of critical/high risk vessels with ESL/Pilot/VTS</td> <td>In Place</td> </tr> <tr> <td>Prohibited anchorage area/control of anchorage</td> <td>In Place</td> </tr> <tr> <td>Provision of charted Pilot boarding grounds to enhance traffic separation</td> <td>Not taken forward</td> </tr> <tr> <td>Single channel VHF operations</td> <td>In Place</td> </tr> <tr> <td>Where practicable, prioritise embarking vessels</td> <td>In Place</td> </tr> <tr> <td>Dedicated VTS Operator</td> <td>Not adopted</td> </tr> <tr> <td>Use of encounter prediction VTS software</td> <td>Not</td> </tr> </tbody> </table>	Recommended / Existing Risk Controls	Status	Additional advice in Admiralty products	In Place	Consider additional met sensors closer to NE Spit	Not taken forward	Coordination of Pilot cutter operations on VHF Ch 69	In Place	Enhanced Pilotage/PEC navigational guidance/lessons identified	In Place	ESL/PLA/MPA Pilot cutter scheduling and monitoring process	In Place	Planning of critical/high risk vessels with ESL/Pilot/VTS	In Place	Prohibited anchorage area/control of anchorage	In Place	Provision of charted Pilot boarding grounds to enhance traffic separation	Not taken forward	Single channel VHF operations	In Place	Where practicable, prioritise embarking vessels	In Place	Dedicated VTS Operator	Not adopted	Use of encounter prediction VTS software	Not
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17	<p>Potential Commercial, Employment or Economic Effects</p> <p>All IPs to present evidence on potential commercial, employment or economic consequences of effects of the proposed development.</p>	<i>All interested parties</i>	<p>238 vessels were served by ESL in the area of the Elbow in 2018.</p> <p>One third of the boardings and landings took place during or adjacent to periods when ESL was operating a restricted service and the Sunk pilot station was either off station or restricted. The remaining two thirds of vessels using the area of the Elbow would have done so as a result either of the sea conditions, or due to traffic considerations.</p> <p>Operations which took place when the Sunk pilot station was off station or restricted almost certainly took place in the vicinity of the Elbow as a direct result of adverse sea conditions which restricted or prohibited ESL's service and the use of the Sunk pilot station. If the Elbow had not been available as the reserve option for pilotage services, it is likely that ESL would not have been able to offer pilotage services at these times. This would have caused significant disruption to these vessels, which included container ships for London Gateway and Port of Tilbury and tankers for Grays, Shell, Navigator, West Thurrock and Oikos oil terminals. It would also have had a knock-on impact to subsequent vessels due at these berths.</p> <p>If the proposed development goes ahead, the use of the Elbow will be [more commonly] restricted or inhibited, which will increase the times that pilotage services are</p>														

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			<p>unavailable and, in turn, decrease the commercial attractiveness of these ports and terminals. The effect of that would be to reduce the employment and economic opportunities offered by the pilotage services, ports and terminals.</p> <p>ESL maintains its position that as a result of the SEZ there will be an increase in vessels detouring around the windfarm instead of using the inshore route (when approaching from the south). If a vessel is reluctant to transit the inshore route, it follows that they will also be reluctant to come to the inner boarding position (when approaching from the North/North-East as a result of the detour). ESL and the PLA therefore believe that there will be an increase in traffic at the existing Tongue DWD.</p> <p>Currently the Tongue DWD is one of ESL's least frequently used positions (86 vessels in 2018). The reduction in sea room between the Tongue DWD and SEZ (by approx. 0.7nm) would require the Tongue DWD to be relocated (even if there is no increase in usage). In anticipation of the extension progressing North, the potential for an increase in use of the Tongue DWD and the fact that we currently don't have a 'relocated' position for the Thanet North Buoy (and therefore no prediction of its effect on traffic behaviour approaching the Tongue DWD), ESL would suggest a relocated Tongue DWD should be approximately 2.4nm miles North/North-East of its current position. This will keep boarding and landing at a safe distance from the Tongue anchorage and the northern boundary of the extension but will inevitably increase passage time and running costs to ESL and pilotage.</p>

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