

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

Response to further information requested by the ExA (ISH8 action point 20) submitted on behalf of the Port of London Authority and Estuary Services Limited

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20	<p>The ExA has considered requests that an updated simulation report be carried out to inform the NRA/ NRAA process in the light of the SEZ material change. The ExA has declined to make a procedural decision that such a study should be prepared at this time, for reasons set out fully in Annex A to this action list. However, the Annex provides an action for the Applicant and ISH8 IPs / OPs to:</p> <ul style="list-style-type: none"> - comment on what the precise brief for such a body of work might be. 	The Applicant and all ISH8 IPs	<p>There are further parts to this Action Point to which the PLA and ESL have been requested to respond at D7 once the Applicant has commented at Deadline 6.</p> <p>The PLA and ESL do not consider that the purpose of any future simulation study should be merely to validate risk controls suggested by the Applicant (Appendix 2 to Deadline 4C: Shipping & Navigation – Statement of Evidence/Post Consent Monitoring/para 111).</p> <p>In order to properly assess feasibility of pilot boarding and landing at the North East Spit Pilot Station (with the SEZ in place), a full bridge simulation study would need to be carried out to inform the NRA/NRAA process, on the basis of the following:</p> <ul style="list-style-type: none"> - The use of a full mission simulator, with the function to allow more than one vessel to be navigated at a time and an increased number of runs with multiple ships (ESL would consider a reasonably busy run to consist of a minimum of 5 vessels to be served, ‘non-pilotage’ traffic would be in addition to this). - Ship models should be representative of a wide range of different types and sizes (in terms of length, draft, deadweight, windage) that might be expected to navigate in the vicinity of the North East Spit. This would need to include, but not be limited to, passenger ships, the largest size container vessel agreed by the applicant for sea room calculations (333m loa) and a pilot launch. - Ship models should be operated by Ships’ Masters who are not familiar with the area to reflect real-world conditions. - The simulations should cover the range of MetOcean conditions in which the pilot boat currently operates, including strong winds from different directions and fog. - Increase in the number of runs carried out; this would need to be a significantly higher

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			<p>number than 14. Runs assessed for projects of a similar scale would usually be in the hundreds; for context ESL carry over 3500 runs per year.</p> <ul style="list-style-type: none"> - The simulations should cover a range of emergency scenarios that may be encountered, including steering gear failure, engine failure, complete back-out and pilot ladder deficiencies/failures. - Human factors should be incorporated into runs, including non-compliance with the COLREGs and communication issues, particularly with small high-risk vessels (such as recreational craft or fishermen) in mind. - A larger area of study; the use of areas around Elbow and NE Spit buoy for boarding and landing (not just passage and approach) should be drawn into simulations. This should also include the use of a relocated Tongue DWD position. - If a new study is to reflect real-world conditions it should include local operators as participants, and so a broader spectrum of experience should be incorporated i.e. newly qualified coxswains and pilots as well as experienced ones.

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