

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

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**Comments on Structures Exclusion Zone Consented Works Clarification Note submitted on behalf of the Port of London Authority  
and Estuary Services Limited**

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Unique Reference Number	EN010084
Document Ref.	PLA 26 / ESL 26
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Date	28 May 2019

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Document reference	Document summary/extract	PLA/ESL comments
Para 9	<i>"It is important to note that the construction phase has, to date, not been a focus of particular concern for Interested Parties (IPs), which is confirmed by the agreed focus of the hazard workshop which informed the Navigation Risk Assessment Addendum"</i>	<p>Due to the lateness of the hazard workshop within the Application process and the very limited time available to assess the hazards at the workshop, it was agreed that the focus of the hazard workshop would be the operational phase of the project. This phase of the project was considered to be the most important, and there was no time available to consider other phases of the project.</p> <p>In the event it was not possible to complete the risk assessment for the operational phase at the workshop.</p> <p>The construction phase is remains of concern to ESL and the PLA, particularly given that it is not meaningfully covered by the Navigation Risk Assessment Addendum.</p>
Para 14	<i>"In the case of a jack-up vessel, the jack up would typically be located within a 200m radius UXO certified area around the proposed foundation location. In this scenario therefore a jack up vessel would potentially be partially within the SEZ for the duration of foundation installation works."</i>	<p>From the material submitted by the Applicant, there would be no restriction on a jack up barge being located wholly within and right up to the outer limits of the SEZ. On the SW side of the proposed extension a jack up barge could extend up to 200m from the foundation pile; that would be to the outer limit of the SEZ. This would restrict the use of the SEZ for navigation by other vessels.</p>
Para 52	<i>"It is also not necessary to limit cable installation works as these are characterised by temporally discrete activities that take place frequently within areas comparable to the inshore route, and indeed have done since construction of the Thanet OWF as is seen from the BritNed, and Nemo cables and perhaps more importantly the London Array export cable which bisected the</i>	<p>Comparison cannot be made between complex interaction between through traffic and vessel manoeuvres in the inshore route with traffic schemes in which the traffic is all going in one direction or along one route.</p> <p>The BritNed and Nemo interconnectors were installed while</p>

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	<i>route into the Thames further west of the proposed project. It is also of note that both BritNed and Nemo interconnectors had to be installed whilst bisecting some of the busiest traffic separation schemes in the world, with the former making landfall just south of Rotterdam which is the busiest port in Europe and one of the three busiest ports in the world."</i>	<p>bisecting busy, but relatively simple traffic separation schemes. The interaction between vessels travelling along different routes, different kinds of vessels, and vessels on manoeuvre in the inshore route is a much more complex picture.</p> <p>This is an area of general navigation, where pilot boarding and landing operations take place in conjunction with vessels on passage, fishing and recreational vessels. The protection provided for navigation under the Application is insufficient and is a navigational and safety concern for ESL and the PLA.</p>

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On behalf of the Port of London Authority and Estuary Services Limited  
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