



TRINITY HOUSE

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

3 December 2019

Your Ref: EN010084

Identification No. 20012441

**The Thanet Extension Offshore Wind Farm Project
Written Response to the Examining Authority following the Secretary of State's
Request for Further Information and Comments on the Application**

Dear Sir / Madam

We refer to the above application for development consent.

This letter sets out Trinity House's response to the Examining Authority (ExA), consequent to the Secretary of State's request for information and comments on the application published on 21 November 2019.

Using the numbering as set out in the letter of 21 November, Trinity House would comment on paragraphs numbered 2 and 3 as follows:-

Marine Navigation, Shipping and Ports Infrastructure

2. Navigation Risk Assessment

Trinity House welcome the additional Collision Risk Model (CRM), which has been prepared for the Red Line Boundary (RLB) and the inclusion of the Structure Exclusion Zone (SEZ).

Trinity House, throughout the whole Examination process, have maintained the position that qualitative data should also be recognised alongside quantitative data when assessing risk. As stated in the introduction on page 1 of the report "...collision risk has been assessed on a quantitative basis both pre and post TEOWF...", Trinity House would request that any qualitative data previously submitted is used in conjunction with the new CRM report when reassessing the residual risk of TEOW including the SEZ.

The report was carried out using AIS data for September 2017 and does recognise the limitations of this timeframe and data set. We would wish to highlight this data set is purely AIS and does not take into account Non AIS equipped vessels. Also the limited weather conditions experienced in the restricted timeframe.

As the area between the windfarm and the Kent coast is an area of general navigation any reduction in the navigable space by TEOW will increase the risk of collision. This has been shown in the CRM report to be approximately 4% based on a data set for just one month and the applicant state in their final point 15 that the increase "...is not considered significant." Trinity House acknowledge that there is an increased risk associated with all projects and it is for the Examining Body and the Secretary of State to decide if the increase is acceptable.

3. Further Navigation Simulation Report

Trinity House were in attendance at the simulation for some of the days and witnessed some of the runs being carried out.

As stated in the report, we raised the issue of how mariners will measure their distances from the windfarm compared to how the scenarios were being run.

In the initial simulation we raised concerns that there was an over reliance on local knowledge and this was addressed by using experienced mariners from other ports. However at times the lack of local knowledge for procedure and operating in this area was apparent during the new trials.

We recognise that most of the simulated runs were only carried out once and some had marginal breaches of the set criteria. In the limited time available the runs were not run again so it is not apparent if the marginal fails, or passes, would get different results using other personnel. This is not purely an issue for this simulation but with simulations for all projects being completed within a restricted time frame and results should be considered with this in mind.

Please address all correspondence regarding this matter to myself at russell.dunham@trinityhouse.co.uk and to Mr Steve Vanstone at navigation.directorate@trinityhouse.co.uk

Yours faithfully,



Russell Dunham ACII
Legal & Risk Advisor

Email: Russell.dunham@thls.org