



TRINITY HOUSE

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

Your Ref: **EN010109**
Identification No. **20032913**

3 July 2023

Dear Sir / Madam,

The Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project General Summary of Oral Submissions at Issue Specific Hearing 7 for Deadline 7

Trinity House (TH) attended Issue Specific Hearing 7 (ISH7) in relation to Shipping and Navigation, and any other relevant offshore and onshore matters, on 21st June 2023.

TH was represented at the hearing by its Navigation Manager, Captain Trevor Harris.

In response to questions from the Examining Authority (“**ExA**”) under agenda items Nos. 3 and 4 (shipping and navigation), TH made a number of oral submissions. A general summary of which is included below.

Summary of TH Oral Submissions at ISH7

The ExA enquired whether TH had been involved in any further discussions and negotiations on shipping and navigation with the applicant. Captain Harris confirmed that TH have not had further discussions and all of its dealings in this regard with the applicant have been through written submissions to the Examination process.

The ExA enquired, when taking into account the National Policy Statement EN-3 paragraph 2.6.165, whether the development posed an unacceptable risk to navigational safety. Captain Harris reaffirmed the TH position in its written submission at Deadline 5 that it acknowledged the reduction in width and the increase in risk which this entailed but would not go as far as to say that the risk was unacceptable. Albeit shipping would appreciate as much sea room as is possible. As TH is unsure what area of the proposed order limits will be used the mitigation measures to be implemented could vary. There could be scenarios during the construction phase where safety zones or other mitigation would reduce the sea room to the extent where the risk becomes unacceptable.

The ExA enquired regarding the distances vessels will pass a windfarm, the applicant and the Maritime and Coastguard Agency (MCA) having stated varying distances. Captain Harris stated that the distance would depend on various factors including the proximity of banks, other infrastructure, and other shipping routes. Captain Harris concurred with the applicant that it appears vessels will use 0.5nm as the minimum passing distance but also stated that TH uses 1nm as the average passing distance when assessing projects.

The ExA addressed the 0.8nm distance which has been stated by other parties, including TH, as the reduction in width of the available sea room relevant to the number of vessels in the area. Captain Harris responded that this is the distance TH used when assessing the development as this is the distance from the buoy to buoy line currently marking the bank and is in TH's opinion the ultimate edge of a safe navigational channel. Captain Harris also stated that, on average, this is not a busy area with around 13-14 vessels per day and a maximum of around 20 vessels using the area. Captain Harris then explained that when marking channels TH would assess the volume and draft of the shipping and mark the channel accordingly. This could be the 8m or, as in this instance, the 10m contour.

The ExA enquired whether it was realistic to consider the shipping lane extending to the shallow patch on the South Eastern point of the Triton Knoll bank. Captain Harris confirmed the 13m and 15m patch to the southeast of the shallowest part of the bank but did not consider that extending the perceived channel as far as this was applicable as the shipping would already have made their course assessment earlier as they approach the effective "Y" junction in the shipping lane.

The ExA requested TH's comments on what it had heard from the MCA and the applicant on channel widths and mitigations. Captain Harris stated that TH would defer to the MCA on channel widths as it is the primary navigational safety body, albeit that it agreed with the applicant's assessment on the depths in the area. Captain Harris explained that, with regard to further mitigation, TH would reassess, and possibly reorganise, its own aids to navigation in the area when the layouts are known and how much of the proposed order limits will be used. This is within TH's normal remit for providing aids to navigation for general navigation and could involve moving buoys further up the Outer Dowsing Channels or on to the Triton Knoll bank.

The ExA enquired as to TH's judgement about the reduction of sea room and the safety risk that reduction would pose, and whether TH considered that, using the COLREGS, vessels could be navigated safely even with the reduced sea room, recognising that there could be accidents at some point. Captain Harris explained that this was on the limits of TH's remit but speaking as a seafarer vessels using COLREGs (specifically referencing Rule 8B) should be able to navigate safely in this area within the proposed order limits.

The ExA enquired regarding the 15.3m depth, which the MCA are using as the controlling depth for vessels navigating the area. Captain Harris concurred with the applicant that TH does not believe vessels are using the 15.3m as a controlling depth as they already have their courses laid down and waypoints planned for passing the windfarms from the south or the rigs to the north. Captain Harris stated that if the proposed order limits are accepted vessels would have to reassess their passage plans and may move slightly to the west.

The ExA enquired whether TH wished to make a comment on the modelling undertaken by the applicant on traffic compression if the proposed order limits were accepted. Captain Harris acknowledged that the process was correct and that the traffic would only move slightly to the west and not across the whole area as shown in the applicant's assessment by the darker green area on the document being viewed. Captain Harris also stated this would be the same assumption TH would make when modelling the scenario.

The ExA enquired whether there was anything TH would disagree with and as to whether TH considered that the modelling showed what would realistically happen in practice. Captain Harris responded that, in TH's opinion, the modelling is correct.

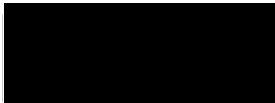
The ExA enquired, when discussing alternative shipping routes, as to what larger ships would do. Captain Harris agreed that there are alternative routes for larger shipping and thought that most of the larger ships would already be using the deeper water routes to the east of the proposed development. Captain Harris agreed there would be an increase in distance for vessels using the alternative route. However, it may be that the few large vessels using the current route are trying to make deadlines so had not used the deeper water route.

The ExA stated that it understood that TH had potentially suggested an obstacle free zone and enquired as to whether this was still required in its view. Captain Harris clarified that TH had not suggested this and reaffirmed that, as TH could not be sure where the turbines would be placed, the use of safety zones that extended outside of the proposed order limits could restrict shipping further and might not be acceptable.

Captain Harris briefly added that TH would defer to the MCA on the assessment of matters relating to the shipping lane. When TH has had sight of the final layouts it would suggest the aids to navigation required as mitigation, including as stated earlier, possibly moving its own aids to navigation.

We trust that this summary is helpful and would ask that all correspondence regarding this matter is addressed to myself at russell.dunham@trinityhouse.co.uk and to Mr Steve Vanstone at navigation@trinityhouse.co.uk

Yours faithfully,



Russell Dunham ACII

Legal Advisor

Email: 