INFRASTRUCTURE PLANNING

THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

THE THANET EXTENSION OFFSHORE WIND FARM ORDER

Comments on the Applicant's responses to action points arising from ISH8 submitted on behalf of the Port of London Authority and Estuary Services Limited

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Action Point	Response summary/extract	PLA/ESL comments
2	Para 5: "The fundamental differences between the Application NRA and the NRA Addendum as revised, is in the number and type of hazards, which was refined based on Interested Party feedback through the examination process."	The PLA and ESL acknowledge that the number and type of hazards were changed from the Application and the NRA Addendum (NRAAA), partly based on feedback from IPs. However, the changes made it difficult to compare the NRA and the NRAA. For example, rather than comparing collisions between Class I and each other category of vessels separately, the NRAA compared collision risk between Class I and all other vessels together. The refinements in the NRAA would have made it quicker to carry out the revised risk assessment in the short time available, but it makes it very difficult to see what comparisons can be drawn between the risks in the NRA and the NRAA.
	Para 8: "As a result, many of the individual hazard input scores were scored on a more precautionary basis than the incident data analysis shows for the Baseline Assessment of risk."	The PLA and ESL consider that incident data analysis cannot be heavily relied on, because the statistics are based on areas of operation where risks have already been mitigated. The area in question is an area where a new hazard has been introduced in the form of the extension, which has not yet been mitigated. Therefore, we do not agree that the approach is precautionary.
	Table, p.9 Area to West of TEOW – "Recognised as the area of concern for all IPs, agreed at the outset of the hazard workshop	The PLA and ESL acknowledge that these were identified as the key area and the key phase. However, they believe that the very short time available was the main driver for not

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	following prior submission with the hazard workshop information pack." Operational phase – "Recognised as the key phase of concern for all IPs"	considering other areas or phases.
	Table, p.10 re new vessels classes – "Recognised as the preferred method of vessel classification by most IPs, agreed at the outset of the hazard workshop following prior submission with the hazard workshop information pack."	It was agreed by IPs to use the PLA classes to break down vessel size, but other considerations which should ordinarily have been assessed, such as hazardous cargo vessels, were not considered by the Applicant in the interests of time.
	Table, p.11 Hazard scoring – various references to consultation in relation to the Application NRA	In relation to the Application NRA, the PLA and ESL consider that there was only limited consultation with PLA on the NRA methodology and there was no consultation regarding the hazard scoring.
	Table, p.11 and 12 – references to "QA/ QC by independent mariners with local expertise"	The PLA and ESL wish to clarify that the independent mariners did not have local expertise of navigating large vessels in the vicinity of a windfarm to board and land pilots.
5	Para 52 – consideration of recreational craft	The Applicant's recreational craft assessment is still reliant upon AIS data which does not cover all recreational craft (Appendix 27 to Deadline 4: Data Analysis and Validation). Whilst the PLA and ESL agree that the RYA heat map can

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		indicate route use for its members, they would still suggest the high volume of visiting recreational craft from Europe, in particular Holland and Belgium, is not recognised. This traffic is significant because of the approach it takes from the North of the windfarm through the inshore route, in ESL's experience more frequently through July and August.
	Para 65: "…whilst a clear line of site is desirable it is not essential. It should be highlighted that the new wind turbines will be larger but spaced further apart. Therefore, the line of sight visually and by radar would be better than that currently experienced with the various wind farms in the Thames Estuary."	The PLA and ESL would place more significance on line of sight as an important part of navigational safety. Larger turbines further apart do not necessarily mean a lower amount of interference with radar or visual impact. The PLA and ESL disagree that rows of larger turbines surrounding the existing turbines will result in '*the line of sight visually and by radar would be better than that currently experienced with the various wind farms in the Thames Estuary'* and has seen no evidence from the Applicant as to how that could be the case.
	Para 67: "A vessel passing north of the wind farm will in the worse case scenario alter from a heading of 270 degrees round to 230 degrees (A change of 40 degrees) to proceed down to the NE Spit diamond. The vessel would be proceeding at reduced speed with the engines on standby for immediate manoeuvring. Once the Pilot is onboard the vessel will need to steer a heading or 010 degrees (A change of 140 degrees) to pass to the east of the NE Spit buoy and then alter heading to 310 degrees. (A change of 60 degrees) There is ample sea room in the vicinity of	The PLA and ESL have not seen any evidence from the Applicant that "worse case scenario" covers worst case MetOcean conditions and surrounding traffic. The angle of approach to the inner boarding ground will become clear once a final position for the Thanet North Cardinal Buoy has been placed so this an assumed angle of approach. The courses provided as a worst case demonstration do not tell us where this vessel engages with

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	the NE Spit buoy to make this turn."	the pilot boat or the possible impacts on those bearings on other traffic. ESL would also need to assess what type of vessel is being considered when judging whether there is in fact "ample sea room".
	Para 68: "The wind farm does not interfere with visibility forward on a vessel as a vessel will seldom be steering directly at a wind farm. If a vessels was to steer directly at a wind farm naturally the view would be a restricted in parts but the prudent mariner would still be able to see through the windfarm by keeping an effective lookout using all available means."	It is not uncommon for ESL to request a vessel to steer toward the windfarm but if this is the case, they require a suitable distance (the 2nm+1nm buffer or more) between the ship and a turbine. This suitable distance is what they consider will become harder to achieve with reduced sea room. The PLA and ESL do not agree with the suggestion that being a prudent mariner means a person will have the ability to see through a windfarm, particularly at night or in poor met ocean conditions. They would suggest the prudent mariner would assume that he cannot see through a windfarm and allow for suitably cautious passing distances in their passage.
12	Para 88: "The Applicant seeks to clarify that the Gate C referred to in the NRA (Section 7.1.3) is a typographical error and the data and accompanying text and conclusions refer to Gate E (which transects between East Margate Buoy and the wind farm). The above analysis and conclusions remain correct and	Figure 38 in the NRA (Section 5.6 *Seasonality)* summarises the daily transit rate through Traffic Gate E, which the Applicant uses to represent inshore route use. It summarises a daily transit rate of between 32 (winter) and 45 (summer) transits per day. This is based on the results of the traffic survey which is the only data set present that

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	relevant."	could capture non-AIS traffic. Gate E is not assessed in the NRAA per se, the transit analysis in the NRAA covers the area between Elbow Buoy to SEZ and NE Spit Buoy to SEZ and only includes vessels with AIS. ESL and the PLA are of the opinion that the inshore area is being assessed in its entirety, not solely as an area of passage but an area of passage/pilotage/recreational use/commercial fishing and an access route to an important safe haven for small vessels (Margate Roads anchorage). With this in mind, the PLA and ESL think it would be difficult to assess inshore route usage relying on a single 'gate'. Any vessel interacting with the inshore route should be given consideration in the NRA. From their experience and records, ESL and the PLA do not agree that only 11 vessels transit the inshore route per day.
15	Future Traffic Growth Assumptions	The PLA and ESL have directly responded to this issue at ExQ3 3.12.15 (see PLA 27 / ESL 27).

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