

From: Fena Boyle <FBoyle@ukchamberofshipping.com>

Sent: 13 December 2019 17:09

To: Thanet Extension <ThanetExtension@planninginspectorate.gov.uk>

Subject: RE: REQUEST FOR INFORMATION AND COMMENTS ON THE APPLICATION - EN010084

Dear Sirs,

The UK Chamber of Shipping thanks the Planning Inspectorate for the opportunity to provide further input into application EN010084. Please see our comments in response to your letter dated 21 November 2019 below.

Navigational Risk Assessment

The UK Chamber of Shipping welcomes the additional Collision Risk Model (CRM).

The Chamber expresses its continued concern that an increase in risk of collision is not deemed to be “significant” within this application, especially when it coincides with a reduction in sea room. It is understood by all that a reduction in sea room, which subsequently reduces the navigable waters for vessels to safely manoeuvre, will increase the risk of collision. The CRM report indicates that this risk, using a data set provided for one month’s worth of traffic, increased by 4% and is “not considered significant” by the Applicant. The Chamber disagrees that these increases are “not considered significant”, nor that the risks associated with project can be considered to be ALARP. Furthermore, whilst the Chamber support the need for quantitative data to be provided within this application, it has been the request of IPs on a number of occasions to ensure that qualitative data is recognised in conjunction with the quantitative data and is submitted in all relevant documents.

The CRM report uses AIS data from September 2017, and whilst being identified by Estuary Services Limited as the busiest month, we do not agree that this AIS data provides an accurate picture of traffic density experienced in these waters. Due to the lack of radar data provided, a large number of recreational craft and fishing vessels are unaccounted for. These vessels also have an impact on the density of traffic in the area and subsequently the additional risk to safety of navigation in the vicinity of this proposed development.

Further Navigational Simulation Report

The UK Chamber of Shipping was not in attendance during the navigational simulations. The Chamber reviewed the specifications beforehand and no comments were provided. Additionally, we offered to assist with the sourcing of mariners should it be needed to ensure independent involvement and provide varied experience and knowledge of the area.

The Chamber welcomes the simulation report and the decision to use coxswains and pilots that were unfamiliar with the area as this provides a more realistic picture of the conditions on board many commercial vessels picking up Pilots and transiting the area. We note that there are a number of simulated runs that encountered minor proximity breaches and that most of runs were only conducted once. Where runs encountered breaches, we believe additional simulations would have provided clarity and that these should have been conducted.

In response to the runs carried out on Day 5, it is important that planning for the future and the possible increase in vessel size is accounted for when considering this application and the Chamber supports the need to simulate runs with vessels that do not currently, but may in the future, use this sea area and associated pilot boarding grounds.

END

The UK Chamber of Shipping continues to be of service to the Planning Inspectorate in this, and other development application proposals, and is happy to provide any further information that may be considered useful. Please do not hesitate to contact me if any further assistance is required.

Kind regards,
Fena Boyle

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