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16/05/2025

Wendy McKay – Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Wendy,

RE: Response to ExQ2 Q15.0.8

Harwich Haven Authority – Response to ExQ2 Q15.0.8

As the Statutory Harbour Authority and Trust Port, HHA has statutory duties to conserve, protect, regulate, maintain and improve the Haven. This includes providing safety of navigation to vessels using the waters within our 150 square mile jurisdiction area. Our jurisdiction covers a 12-mile approach to Harwich Harbour, the River Stour, and parts of the River Orwell. We are responsible for the conservancy of the main navigation channel into the Haven, which requires an ongoing maintenance dredging programme to maintain the depth required to accommodate the very largest and deepest container vessels in operation.

We operate a 24/7, 365 day a year service to provide pilotage services to five port operators in the Haven, Port of Felixstowe, Navyard, Harwich International Port, Port of Mistley and the Port of Ipswich. The continuous, and uninterrupted flow, of vessels into the Port of Felixstowe is critical to UK trade, with almost 40% of all containerised goods entering the UK via this gateway.

The largest trade gateway in the UK

In the early Autumn, 2023 we completed a £130m large-scale project to deepen the navigational approach channel into Harwich Harbour to 16.0m below chart datum. The purpose of the project is to accommodate the ever-growing breed of Megamax vessels in operation that call at the Haven ports. With a deeper navigational channel, and new deeper berths at the Port of Felixstowe, we envisage the combined value proposition will attract many more shipping lines to use the Port of Felixstowe and therefore vessels arriving and departing the Haven will increase. The worldwide maritime industry trend for less ship movements but larger vessels carrying equivalent tonnage looks set to continue and, in time, further channel deepening will be required to meet future requirements for UK shipping.





The Haven trade gateway is critical to UK PLC and our pilotage services cannot be interrupted. Delayed or missed Megamax arrivals would cause significant cost implications to Harwich Haven Authority. The ports industry is highly competitive and dissatisfied shipping lines are highly likely to look for an alternative port, potentially in Europe, if they do not receive the service standards they require.

Harwich Haven Authority's Trust Port stakeholder values

As a Trust Port we operate commercially but we do not have shareholders, which allows us to reinvest a percentage of our surplus profits back into the Haven for the benefit of stakeholders. We define a stakeholder as anyone that uses, or has an interest in, the Haven and/or our operations. Harwich Haven Authority acts as a custodian of the Haven, and we have a duty to conserve, protect, regulate, maintain and improve our area of jurisdiction.

We understand that regulatory bodies such as Natural England and the Environment Agency will have been included within your consultation and urge that their comments are given due consideration to the extent that they relate to the legally protected and designated areas that exist within the Haven.

Harwich Haven Authority (HHA) welcomes the opportunity to provide further clarity on operational conditions and navigational constraints affecting the Sunk Inner and Sunk Outer Precautionary Areas in relation to the proposed North Falls Offshore Wind Farm. As the statutory harbour authority responsible for the safety of navigation in the Harwich Haven area, including key access channels to the Port of Felixstowe and Harwich International Port, we maintain an active role in ensuring maritime safety and operational efficiency.

The Sunk Precautionary Areas (Inner and Outer) are critical components of the UK's deep-water navigation infrastructure. These areas are situated at the convergence of high-volume shipping routes leading to/from major North Sea ports and include the Sunk Traffic Separation Scheme (TSS). Vessel traffic in this region includes large container ships, tankers, Ro-Ro ferries, and bulk carriers, often operating in constrained under-keel clearance (UKC) conditions.

Alongside this letter, the Authority will provide a supplementary PDF documents illustrating the swept paths (track / route taken) of tidally constrained and deep-draught vessels operating within the Sunk Inner and Outer Precautionary Areas. This dataset is based on AIS and pilotage information collected over a full 12-month period, from September 2023 to September 2024. The analysis identifies the typical manoeuvring corridors, alignment with the established traffic separation

scheme, and lateral movement patterns of large vessels—particularly under constrained tidal windows. This evidence is intended to support our response by highlighting the spatial requirements for safe navigation in this high-density and operationally sensitive area, including for vessel in up to 400 metres and currently with a draughts of 17.1 metres (to date).

HHA acknowledges the applicant's updates to the Outline Navigation and Installation Plan [REP4-011] and the accompanying Deep Water Route Cable Installation Areas Plan [REP4-043]. However, we believe the control measure need to be contained within the body text of the DCO and embedded marine licence as protective provisions and not just referenced as a required for a plan or document such as an Outline Navigation and Installation Plan.

1. We request that no Restricted Ability to Manoeuvre (RAM) works conducted by the North Falls project should run concurrently with RAM works already planned by the Five Estuaries, Sealink and Tarchon project developers (or other development projects) in the Sunk area. It is our opinion that this would cause an unacceptable level of navigational risk. Therefore, we insist that the Sea Link project liaise with other planned project teams and ourselves to avoid this situation. This requirement for no RAM concurrent works, operations or activity must be written into the DCO.
2. Exclusion zone(s) must not be put in place in the Sunk area or channel that would restrict 24/7/365 vessel access requirements or pilot boarding operations etc.
3. Safety zone(s) will not be able to impede vessel traffic movements within the Sunk area or normal operations such as pilot boarding.
4. We suggest that no cable joints to be in locations in the Sunk area, due to extra work required in this busy shipping area, leading to increased navigational safety risk.
5. In the Sunk area, cable depth needs to consider that the world's largest vessels may anchor and dredge anchors in emergency scenario.
6. The cable depth must take into account the draught of current and future vessels and future dredging. The DCO should provide for a maximum draught of 20m plus 10% UKC, as such minimum depth required 22m below chart datum.
7. Suggest that no project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility below nautical 2 miles.

Conclusion

HHA recognises the strategic importance of offshore renewable energy development and supports its advancement provided it is compatible with navigational safety and operational resilience. We



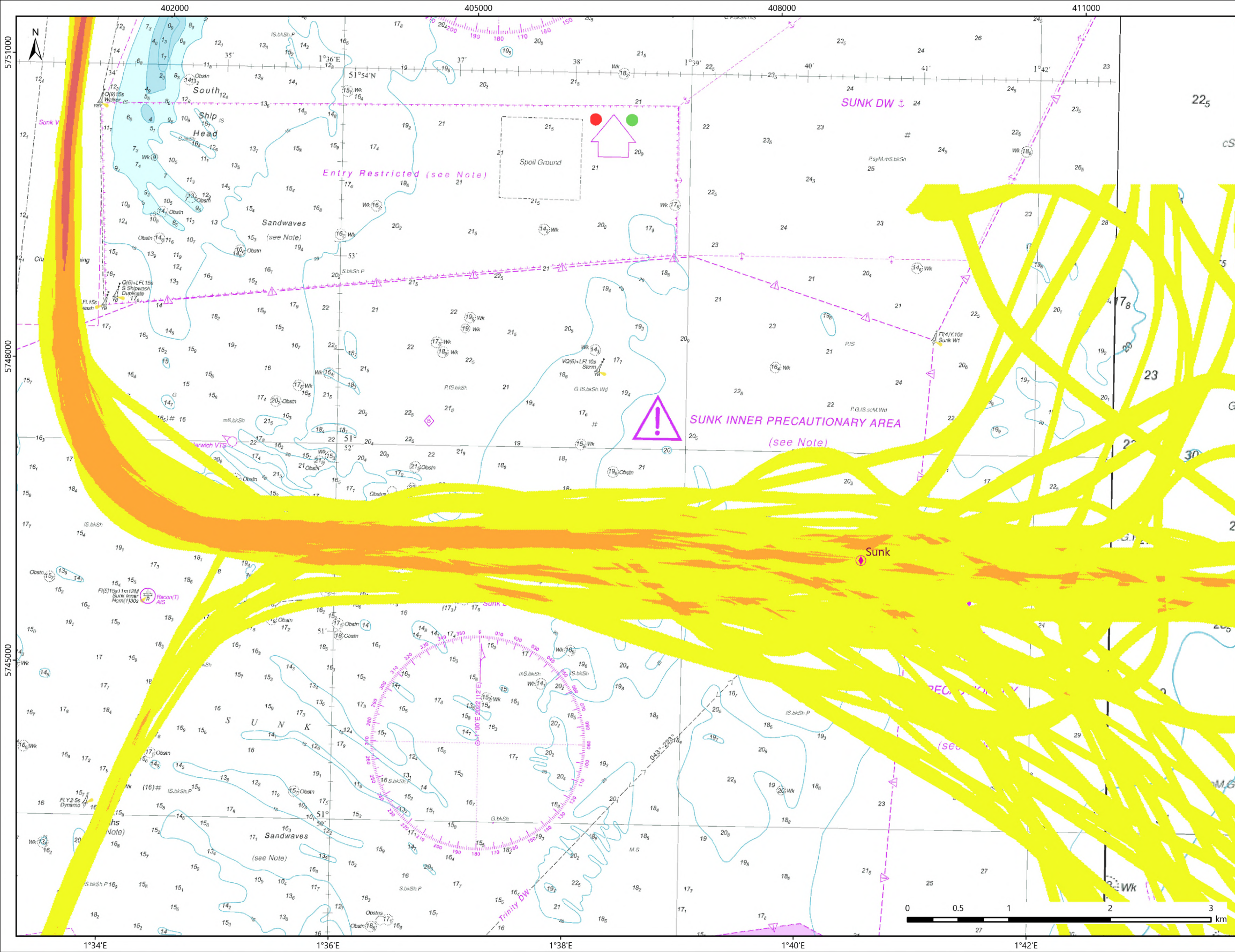
welcome continued engagement with the applicant to ensure these objectives are met and reiterate the need for robust safeguards to be embedded in the final DCO and supporting documents. We are happy to provide further detail on specific constraints or operational considerations as the Examination progresses. Additionally, we would be very pleased to welcome the Planning Inspectorate team to Harwich Haven, where we can explain and demonstrate our functions, statutory responsibilities, and the unique operational environment in which we work.

Yours Sincerely,

A black rectangular box redacting the signature of the Marine Director.

Marine Director (Harbour Master)





Legend

Vessel swept path analysis
Automatic Identification System (AIS) data
365 days: 01/09/2023 to 31/08/2024
Data collected by Harwich Haven Authority

Count of vessels with draught >16m

1 - 5
6 - 20
21 - 39

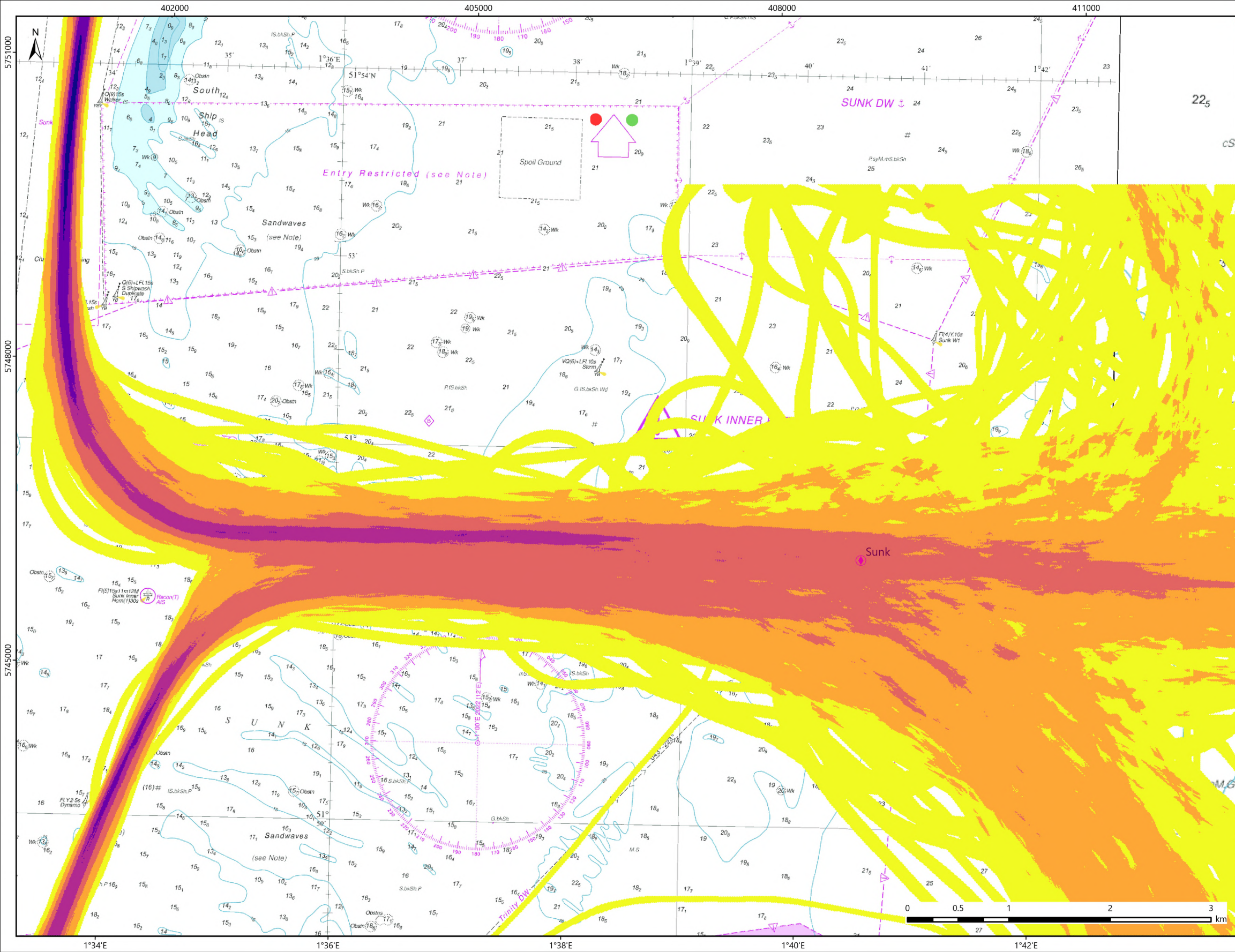
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Date	By	QA
Nov 24	OJR	CRO

Coordinate System
WGS 1984 UTM Zone 31N

Projection
Transverse Mercator

Project No. 5474
Fig5_SunkInner_16_grt_A3



Legend

Vessel swept path analysis
Automatic Identification System (AIS) data
365 days: 01/09/2023 to 31/08/2024
Data collected by Harwich Haven Authority

Count of vessels with draught > 14.5m

- 1 - 5
- 6 - 20
- 21 - 50
- 51 - 75
- 76 - 125
- 126 - 197

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Project No. 5474
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