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22 July 2025

The Planning Inspectorate

National Infrastructure Directorate

Temple Quay House

Temple Quay

Bristol

Dear Planning Inspectorate,

**RE: North Falls Offshore Windfarm – Representation by Harwich Haven Authority:
Navigational Safety and Pilotage in the Sunk Area**

Harwich Haven Authority (HHA), as the Statutory Harbour Authority and the Competent Harbour Authority for pilotage into and out of the Harwich Haven and surrounding areas, submits this representation to the examination of the North Falls Offshore Windfarm Development Consent Order (DCO) application.

This representation addresses HHA's ongoing concerns regarding navigational safety and pilotage operations in the Sunk area, a critical maritime zone serving the UK's busiest container port and accommodating some of the world's largest commercial vessels.

We recognise and support the UK's ambition for offshore wind expansion and appreciate the applicant's efforts to engage constructively with stakeholders. However, HHA remains concerned that the proposed development, in combination with existing and planned infrastructure, introduces risks that have not been fully mitigated, particularly concerning pilotage operations, vessel manoeuvring space, and safe transit through the Sunk area.

Harwich Haven Authority's Role and Strategic Context

HHA oversees one of the UK's most significant and heavily trafficked maritime gateways. We are responsible for ensuring navigational safety and providing compulsory pilotage for vessels serving:

- The Port of Felixstowe – the UK's principal container terminal;
- Harwich International Port – a key Ro-Ro and passenger terminal;
- Ports of Ipswich and Mistley, as well as future expansion at Bathside Bay.

Our area of interest includes the deep-water approaches and pilot boarding grounds in the Sunk area, used routinely by Ultra-Large Container Vessels (ULCVs) up to 400 metres in length and currently drawing up to 17.1 metres. These operations demand significant sea room, precise pilotage, and are often conducted in marginal weather and complex tidal conditions. Any loss of navigable flexibility in this area could have serious implications.





DCO Control of Concurrent RAM Operations

HHA acknowledges the applicant's position that commitments regarding concurrent works are secured through the certified outline Navigation and Installation Plan (NIP), and that procedural safeguards exist via our role as a named consultee and the MMO's discharge process.

However, we maintain the position that controls over concurrent construction and maintenance Restricted Ability to Manoeuvre (RAM) operations in the Sunk area must be explicitly secured within the DCO itself, rather than being embedded solely within associated certified documentation. From our perspective, this offers a more transparent and legally robust mechanism to manage a safety-critical issue.

Given the material implications of concurrent working on navigational safety in a highly constrained and operationally sensitive zone, we believe this matter warrants formal determination by the Examining Authority, or ultimately the Secretary of State.

We note the Maritime and Coastguard Agency's recent comments and interpret them as reinforcing the importance of this issue rather than resolving it.

Conclusion and Recommendations

HHA supports the UK's transition to renewable energy and remains committed to cooperative engagement with the applicant. However, we cannot support a scheme that compromises the safe pilotage and navigation of the largest commercial vessels serving the Haven ports.

We therefore respectfully request that the Examining Authority:

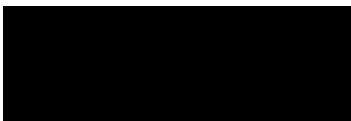
Requires further assessment of navigational safety impacts in the Sunk area taking into account the four planned cable route DCO projects.

Ensures that any residual risks are mitigated through clear and enforceable DCO-level provisions.

Recommends that no infrastructure, safety zones, project works, or RAM activity impinges on operational sea room critical to pilotage.

We would welcome the opportunity to provide further detail throughout the examination progresses.

Your faithfully



William Barker

Marine Director (Harbour Master)

