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**Emne:** VS: Høring av Dogger Bank offshore vindkraftverk i UK

Vi viser til Miljøverndepartementets e-postmelding 2013-04-29 om høring av Dogger Bank offshore vindkraftverk i UK .

Denne kortfattede høringsuttalelsen går i hovedsak inn på problemstillinger knyttet til sikker og effektiv sjøtrafikk i vindkraftverkets operative fase.

"Please note that the following comments on the final pre-application consultation regarding the Dogger Bank Creyke Beck offshore wind development mainly are related to the safety and efficiency of navigation in its operational phase.

It is our understanding that 500 metre safety zones can be established around wind farm installations in accordance with Article 60 in the United Nations Convention on the Law of the Sea. Further there are measures, such as an "Area to be avoided", that can be implemented in accordance with the International Maritime Organizations (IMO) General provisions on ships' routing. The concept proposed for use within the Dogger Bank Zone, "Chartered Advisory Safety Areas" is probably less known to mariners than measures in the IMO provisions, and their legal basis may be unclear. An advantage by having a measure adopted by IMO, may be that these are promulgated by an IMO circular and binding for all member nations.

It follows from the consultation that vessels will have a high tolerance and adaptability to the impact of the Dogger Bank Creyke Beck A, B wind development. We find this to be credible, but would like to point out that a further development of wind farms on part of or on the whole of Dogger Bank will have an adverse effect on vessel traffic unless there are established "shipping routes" that are broadly acceptable (cfr. Maritime and Coastguard Agency - Marine Guidance Note 371)."

Mvh

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