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Agency

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www.gov.uk/mca
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Dear Sir/Madam

Hornsea Project Four Offshore Wind Farm – EN010098

Examination Timetable – Deadline 2 – ExQ1 Response

Thank you for your letter dated 28 February 2022 inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Secretary of State as part of its assessment of the proposed Hornsea 4 project. The MCA would like to respond to the questions as follows:

1. **NAR 1.3 Operational Safety Zone for accommodation structures**

Confirm if you are satisfied with the proposed operational safety zones around offshore accommodation structures and if not, why not and what dimension would you want to be secured?

MCA response:

MCA would support operational safety zones around accommodation platforms for safeguarding personnel on manned infrastructures.

2. **NAR 1.4 Single Line of Orientation justification**

Are you satisfied with the Safety Justification for Single Line Orientation [APP-047], with particular reference to aircraft Search and Rescue operations (SAR) and other flying within the proposed array? If not, why not and what measures would be needed to address this?

MCA response:

Safety Justifications for single line of orientation are accompanied by a proposed turbine layout design which is normally received post-consent. MCA has not received a proposed layout design and is unable to comment on the safety justification at this stage.

3. **NAR 1.5 Layout principles and Search and Rescue**

Are you satisfied that the draft DMLs in the draft DCO [APP-203] would secure the commitment made in pre-application consultation between the Applicant and TH that after post-consent design development "*Micro-siting ... would not compromise the 500m minimum width required for the SAR lanes as required*

by *Layout Principle 3*" [APP-047, page 16] and if not, why not and what additional drafting would you wish to see inserted?

MCA response:

MCA is satisfied with the commitment to ensure the minimum width for SAR lanes is not compromised. This has been discussed with the applicant for agreement of the layout principles.

4. NAR 1.6 Definition of separation distance between Hornsea Four and Hornsea Two

Confirm if you are satisfied with the exclusion of blade overfly from the proposed separation distance between Hornsea Four and Hornsea Project Two (June 2020), the distance definition between WTGs centre-to-centre and the potential for ancillary equipment (eg jack-up plant) to reduce the navigable gap width between the two developments. If you are not satisfied, why not?

MCA Response:

When measured from blade tip to blade tip the distance reduces to approximately 1.9nm. Given the low probability of encounter between two or more vessels, the narrowest meeting point is very short and navigable sea space increases on both sides after the narrowest point, MCA has accepted the exclusion of blade overfly from the proposed separation distance of the gap between arrays. We also understand the vessels might experience increased radar interference while passing by another vessel through the gap, but MCA considers this as acceptable because of the bow-tie shaped gap and the period of increased interference will be low.

Ancillary equipment has the potential to reduce the navigable gap, however MCA would expect them to be positioned so as not to reduce the gap as far as practicably possible. Whilst any ancillary equipment during construction and major maintenance will attract a safety zone, vessels may still enter a safety zone if they are avoiding a collision or when in distress, therefore in such an event there is minimal impact on the reduced available sea room for manoeuvring.

5. NAR 1.7 Navigational risk assessment for gap between arrays

Please confirm whether you are satisfied with:

- the navigational risk assessment conclusions for shipping transit through the proposed gap between Hornsea 4 and Hornsea 2 with a 'pinch-point' of 2.2nm width (centre to centre of proposed WTGs); and
- the appropriateness and sufficiency of additional safety measures proposed in the ES [APP-082] during construction or maintenance of the proposed OWF when the width could be reduced by the presence of construction vessels and safety zones and noting TH's concern that the given width does not account for WTG blade overfly.

If you are not satisfied with this explain why and what actions you would wish to see to address your concerns.

MCA response:

MCA has reviewed the NRA and is satisfied with the conclusions for shipping transiting through the gap between the two arrays.

The list of proposed risk controls in section 19.3.10 in APP-082 is accepted as appropriate. The list of proposed risk controls during construction and maintenance in section 23 of APP-082 is also appropriate. These are additional risk controls to the list of embedded risk controls in APP-019 and whilst they are appropriate for reducing navigational risk, MCA would consider several of them to be embedded risk controls and we note that within the hazard log (Table B.1 of APP-

083 NRA Part 3) it does not list any additional controls in the column titled "Further Mitigation and Additional Comments".

It is expected that all appropriate risk controls for construction and operation phases will be captured in the DCO/DML and in post-consent plans where there will be consultation with the MCA and other navigation stakeholders, as appropriate.

6. **NAR 1.8 Traffic Monitoring**

Are you satisfied with the Applicant's response and commitment to Traffic Monitoring "*for the duration of the construction period*" [APP-133, page 355]? If not, why not?

MCA response:

MCA is content with the applicant's response and commitment to traffic monitoring during the construction period. However, the wording of the conditions in the Deemed Marine Licence requires an amendment to provide the reports to Trinity House in addition to the MCA and MMO:

- Schedule 11 Part 2 condition 18(2)(b)
- Schedule 12 Part 2 condition 18(2)(a)

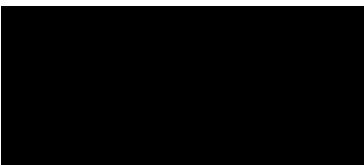
The wording of the conditions should read:

Construction monitoring must include vessel traffic monitoring by automatic identification system for the duration of the construction period. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the construction period.

MCA would also expect vessel traffic monitoring after construction, however it is noted there is no condition within the DML to capture this requirement other than a commitment to provide post-construction monitoring plans at a later date. The standard wording of the condition MCA would like included in the DML is:

Post construction monitoring must include vessel traffic monitoring by automatic identification system for a duration of three consecutive years following the completion of construction of authorised project, unless otherwise agreed in writing by the MMO. An appropriate report must be submitted to the MMO, Trinity House and the MCA at the end of each year of the three year period.

Yours faithfully,



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