

28 March 2022

Hornsea Project Four Offshore Wind Farm Examining Authority Round One Questions and Responses

Question Reference	Responders	Question	UK Chamber of Shipping Response
NAR.1.2	UK Chamber of Shipping (UKCoS) and Applicant	<p>Consultation with shipping operators</p> <p>Noting the Applicant's point [APP-133] that "DFDS Seaways were identified as the principle regular operator and were the only contacted party to express an interest in participating in consultation" would UKCoS please confirm if it is satisfied with the extent of the Applicant's consultation with shipping operators? If UKCoS considers other specific regular shipping operators should have been consulted, please provide details and explain why they should have been consulted. Would the Applicant please confirm how many times unsuccessful attempt at consultation contact with Finnlines was repeated and what steps were taken to establish if communication was received.</p>	<p>The Chamber, following the additional consultation and engagement undertaken by the applicant with its members, is now satisfied with the consultation to its shipping operator members.</p> <p>The Chamber cannot comment to its level of satisfaction of the applicant to seek consultation with other regular operators not within membership of the Chamber, but believes reasonable efforts and attempts were made.</p>

NAR.1.6	Maritime and Coastguard Agency (MCA) and Trinity House (TH) and UK Chamber of Shipping	<p>Definition of separation distance between Hornsea Four and Hornsea Two</p> <p>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?</p>	<p>The Chamber has consulted with its membership and whilst it would like to see blade overfly included in the 2.2nm separation distance as provides for greater navigable safe searoom, the Chamber is satisfied that the proposed separation distance between Hornsea Four and Hornsea Two excluding blade overfly can be ALARP.</p> <p>With regards to the potential for ancillary equipment to reduce the navigable gap further, the Chamber would like to see the applicant position ancillary equipment within the development Red Line Boundary whenever possible and outline a commitment to do so, whether during construction, operation & maintenance or decommissioning. In doing so, it will ensure that the navigable safe searoom is maximised. The Chamber acknowledges there may be occurrences when this is not possible nor feasible.</p> <p>The Chamber would also like to see a commitment that Hornsea Four and Hornsea Two will coordinate and schedule the planning of works so that a scenario whereby two or more ancillary units or vessels attending outer row turbines for purpose of work do not reduce the navigable searoom cumulatively. Given the “bow-tie” layout of the respective Red Line Boundaries, the Chamber considers the likelihood of this occurrence relatively remote but wishes to see safe passage through the gap prioritised.</p>
NAR.1.7	Maritime and Coastguard Agency (MCA) and Trinity House (TH) and UK Chamber of	<p>Navigational risk assessment for gap between arrays</p> <p>Please confirm whether you are satisfied with:</p> <ul style="list-style-type: none"> • the navigational risk assessment conclusions for shipping transit through the proposed gap between 	<p>The Chamber has reviewed the NRA and is satisfied with the navigational risk assessment conclusions for shipping transiting through the proposed gap between Hornsea Four and Hornsea Two.</p> <p>The Chamber views the safety measures as acceptable but would</p>

	Shipping	<p>Hornsea 4 and Hornsea 2 with a 'pinch-point' of 2.2nm width (centre to centre of proposed WTGs); and</p> <ul style="list-style-type: none"> the appropriateness and sufficiency of additional safety measures proposed in the ES [APP082] 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. <p>If you are not satisfied with this explain why and what actions you would wish to see to address your concerns.</p>	see the commitment as stated in the response to the prior question as preferable.
NAR.1.8	Maritime and Coastguard Agency (MCA) and Trinity House (TH) and UK Chamber of Shipping	<p>Traffic Monitoring</p> <p>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?</p>	<p>The Chamber believes AIS traffic monitoring is highly important in ensuring the risk mitigations proposed by the applicant result in risk reduction to ALARP as the modelling put forward suggests. As such ending Traffic Monitoring immediately following the end of construction will not enable this to occur and should be reconsidered.</p> <p>The Chamber notes however that within (APP-083) A5.7.1 NRA Part 2 paragraph 628, states:</p> <p><i>"Whilst no Radar monitoring of vessel movements has been proposed for the Hornsea Four array area, AIS monitoring will be available from a vessel (during construction) and site location (during operation and maintenance) to record the movements of vessels around the Hornsea Four array area."</i></p> <p>The Chamber understands this to mean that site location AIS recording will be undertaken during operation and maintenance phases. The Chamber supports this statement to undertake site monitoring during these phases and hence is unclear as to the</p>

			<p>response given to the MCA on page 355 of APP-133 for monitoring only during construction.</p> <p>In the Chamber's view, the vessels within its membership all exceed the tonnage to which AIS transponders are mandatory. Accordingly, radar monitoring is not as crucial and post consent monitoring should focus on AIS.</p>
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