Submission ID: 9151

## Introduction

2.1 Viking Link is a 1400MW electricity interconnector between the high voltage networks of Great Britain and Denmark, and is being developed and constructed by Energinet and National Grid Vi-king Link Limited. Viking Link is fully permitted in all jurisdictions, and awarded contracts in 2019 for the supply and installation of equipment based on an accepted risk position along the length of the project. Cable installation for Viking Link is currently taking place in the UK Sector and the project will be operational by end 2023 with an operational life of 40 years. Interaction between Viking Link and the Project

2.2 In the initial plans shared with Viking Link by the Promoter, the Viking Link cables ran through the proposed site for the wind turbines. This interaction could easily have been managed by a crossing agreement. However, Viking Link were then made aware of a â€~Structures Exclusion Zone ("SEZ―)' which has been introduced by the Promoter. This SEZ forms a narrow gap of approximately two nautical miles between the Project and the Hornsea 2 wind farm and has been introduced to allow marine traffic to navigate between the wind farms as a direct route to the harbour. The SEZ is di-rectly above the Viking Link cable and allows a constrained route for the navigation of marine ve-hicles.

- 2.3 NGVL first noted concerns in relation to the proposed SEZ in September 2020.
- 2.4 The workshop at which the SEZ seems to have been formalised was advertised as a †workshop for shipping stakeholders'. As NGVL is not a shipping stakeholder, and it had requested the relevant information prior to the workshop but did not receive anything, it did not attend this meeting. In-deed the email stated "the Hazard Workshop will be an opportunity to discuss issues relating to the safety of navigation for shipping and navigation users (vessels and routeing), with impacts af-fecting other users such as oil and gas platforms and helicopters being considered under separate and focused consultation.― Following the meeting, NGVL asked a number of times for the proposed new red line to be provided so that it could consider its position. 2.5 There was considerable delay in providing the correct technical information to NGVL to consider. Further, in updating PINS of the change in the Project boundary, NGVL's position was misrepre-sented. The meeting note states that "The Applicant confirmed that oil and gas stakeholders had been broadly in agreement on this change and that the Viking Link interconnector also supported it―. (This has since been corrected by PINS). This clearly acknowledges that NGVL is an important stakeholder in relation to this change but the decision Orsted made to adopt this boundary change was taken prior to NGVL being provided with the requested information

Increased Risk to the Viking Link Cable as a result of the Project

- 2.6 Viking Link believe that that a section of the Viking offshore cable route would be subject to a higher risk of anchor strike and vessel sinking over the design lifetime of the Viking Link Intercon-nector as a direct result of the presence of the Project and this SEZ which has been introduced be-tween the Project and Hornsea 2.
- 2.7 The Promoter's Navigation Risk Assessment predicts that the risk of ship collision in the area is increased.
- 2.8 In addition, any cable repair works in the area between the projects is subject to increased risk because of the constrained area and numbers of close ship passages.
- 2.9 Damage to the Viking Link cable route would result in major disruption to this important intercon-nector which is essential to meeting the UK's energy commitments and to energy security.

## Suggested Mitigation

- 2.10 Viking Link consider that mitigation will be required to ensure that the risk to the Viking Link cable from the Project is limited. It is considered that this mitigation could consist of rock placement over the Viking Link cable if this is required following survey, in addition to some form of traffic management (IMO routeing measures).
- 2.11 Viking Link have been engaging with the Promoter and are keen to continue this

engagement with a view to find forward safely and effectively.	ing a mutually agreeable solution to	allow both projects to come