Response to EA Question 5 in "Hearing Action Points arising from Issue Specific Hearing 3: Offshore Environmental Matters that was held virtually on Tuesday 26 April 2022"

Question

NEO and Perenco to respond to the Protective Provisions proposed by the Applicant at Deadline 3.

Perenco Response

The Protective Provisions proposed by the Applicant for NEO at Deadline 3 would ensure that no wind turbine generator would be erected within a restricted area defined as the spherical area of seabed having a radius of 2.7nm from the centre of (in NEO's case) the Babbage platform. As the Applicant advised the Examining Authority at the hearing on 26 April 2022, a set of draft protective provisions was shared with Perenco on 21 April 2022. These draft protective provisions also proposed a restricted area of 2.7nm around the Ravenspurn North CC platform. The draft protective provisions also provided a proposed mechanism in the event of any impairment of the radar early warning systems (REWS) used by Perenco to protect their platforms from vessel collision. The Applicant and Perenco have now reached agreement on measures to ensure the continued operability of their REWS and this will be the subject of a separate agreement between them.

The intended purpose of the 2.7nm restricted area in the Protective Provisions proposed by the Applicant is to allow space for helicopters to operate safely to and from a platform. Perenco is in discussion with the Applicant and has been taking advice from its aviation service provider. Perenco cannot accept that a radius of 2.7nm is sufficient to allow aviation operations to take place to and from a platform under a sufficient range of met-ocean and visibility conditions. A larger restricted area is required to prevent material disruption to Perenco's operations. Constructive discussions are however continuing with the Applicant and Perenco is committed to seeking arrangements that would allow the parties to coexist.

Perenco propose to provide the Examining Authority with an update on or before Deadline 5.