



Maritime &
Coastguard
Agency

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Your ref: EN010109

Dear Sir/Madam

Application by Equinor for an Order Granting Development Consent for the Sheringham and Dudgeon Extension Projects.

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010

Examination Timetable – Deadline 1 – Examiner’s Questions 1

Thank you for inviting the MCA to provide additional information to the Secretary of State as part of its assessment of the proposed Sheringham and Dudgeon Extension Projects. We would like to respond to the Examining Authority’s questions as follows:

1. Q1.7.2.1 - Effects on fishing enterprises as a result of navigational or special restrictions

The ES states: “The Applicant considers the most effective way this could be achieved would be to restrict fishing on sandeel, and with respect to prey availability for Sandwich tern, sprat or juvenile herring in UK waters. However, this would need to be implemented either by Defra in the case of sandeel or the relevant Inshore Fisheries and Conservation Authority (IFCA) in the case of sprat and juvenile herring fisheries within UK inshore waters.” [APP-069, Paragraph 127].

What is your assessment of the economic effects on fishing communities if such restrictions were imposed?

MCA Response

The economic effects on fishing communities lies outside the remit of the MCA and they have not been assessed.

2. Q1.19.1.3 - Vessels and Electro-Magnetic Fields

Within ES Chapter 13 [APP-099], there is no clear reference or assessment as to the potential impact of EMF upon navigation and magnetic compasses, for example. In respect of this:

- a) Can the Applicant explain why the assessment has not been undertaken or signpost as to where this may have taken place?

- b) Can Trinity House and MCA set out whether there is a real risk of effects of EMF upon navigating ships and/ or what measures sailors employ to counteract any effect on their navigation equipment.

MCA Response

The proposed arrangement of offshore transmission is through a High Voltage Alternating Current (HVAC) cable which is expected to have no effect on electro-magnetic fields (EMF) and hence vessel magnetic compasses are not expected to be affected. If the project was to use a High Voltage Direct Current (HVDC) cable for transmission MCA would have advised the applicant to carry out a compass deviation assessment on the predicted effects on ships magnetic compasses.

3. Q1.19.1.4 Risk Mitigation for Fishing Vessels

Is the Outline Fisheries Co-existence and Liaison Plan [APP-295] as drafted sufficient to mitigate risk to fishing vessels in the vicinity of service vessels working on the Proposed Development?

MCA Response

MCA does not normally comment on Fisheries Co-existence and Liaison Plans for mitigating the risks associated with fishing activity. Fishing vessels must comply with the Collision Regulations at all times, including when in the vicinity of service vessels. It should be noted that the FLOWW Best Practice Guidance for Offshore Renewables Developments is currently being reviewed.

4. Q1.19.1.5 - 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 has not been able to find any indication within the Chapter 4 Project Description (APP-090), Chapter 13 Shipping and Navigation (APP-099) or Appendix 13.1 Navigation Risk Assessment (APP-198) that Equinor will apply for accommodation platform safety zones. However, if Equinor does apply for an operational safety zone around accommodation platforms, MCA would support it as a necessary risk mitigation measure whether the structures are anchored, jacked up or have permanent foundations.

5. Q1.19.1.6 - Marine Vessel Safety and Navigational Risk Assessment

Are you satisfied that the Proposed Development, subject to implementation of management plans and the level of mitigation proposed by the Applicant, reduces navigational risks and safety hazards to 'as low as reasonably possible' (ALARP)? If not, what more needs to be done to give you reassurance?

MCA Response

The list of embedded risk controls in Table 20.1 of the NRA and Table 13.3 of the Shipping and navigation ES Chapter is appropriate and it is noted that as per 21.3.1.1 the Navigational Management Plan (NMP) is the only additional mitigation measure proposed for reducing risk to As Low As Reasonably Practicable (ALARP). It is understood the NMP will be developed to manage and mitigate impacts associated with crew transfer vessels during the construction, operation and major maintenance phases. It is not recognised the NMP will mitigate the impacts of deviation and third-party collisions to ALARP. We would like the applicant to consider further mitigation measures such as amendments of the red line boundary.

6. Q1.19.1.8 - Water Depths over Cables

Is it sufficient that the Applicant would consult with the MCA and Trinity House in any instances where water depths are reduced by more than 5% as a result of external cable protection to determine whether additional mitigation is necessary to ensure the safety of passing vessels? Furthermore, what type or form of mitigation would this likely be if necessary?

MCA Response

It is important that Equinor consults MCA and Trinity House in any instances where water depths are reduced by more than 5% so that the potential impacts on safe navigation can be assessed and any necessary mitigation measures can be agreed. The type of mitigation is dependent on location, water depth, traffic type and volume.

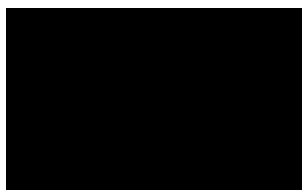
7. Q1.19.2.1 Layout Principles for Search and Rescue

Are you satisfied that the dDMLs contained with the dDCO would secure the necessary commitments to enable safe and practical search and rescue operations? If not, what additional wording/ drafting would you wish to see inserted?

MCA Response

The necessary commitments to enable safe and practical Search and Rescue (SAR) operations will be discussed and agreed with the applicant post-consent. This will include completion of a SAR checklist as per MGN-654 Annex 5 and a site-specific Emergency Response Cooperation Plan (ERCoP). MCA will ensure satisfactory completion of these arrangements are in place through Schedule 10, Part 2, Condition 16 and Schedule 11, Part 2, Condition 16.

Yours faithfully,



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