



The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

30 Park Street
London
SE1 9EQ

██████████@ukchamberofshipping.com

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Dear Sir / Madam

**The Sheringham and Dudgeon Offshore Wind Farm Extension Projects
Submission in response to the Examining Authority's Third Written Questions (WQ3)
Examination Timetable – Deadline 5**

The UK Chamber of Shipping, (hereafter “the Chamber”), welcomes the invitation to provide written response and additional information to the Secretary of State in their examination of the proposed Sheringham and Dudgeon Offshore wind farm extension projects.

Q3.19.1.5 - Assessment of Navigational Risk and Safety

With regards to the concerns raised relating to navigational safety from the MCA [REP1-117] [REP1-118] [REP3-134] [REP4-047], together with the Applicant's submissions (including the NRA [APP-198] and the Navigational Safety Technical Note [REP3-031]) comment on whether you would consider the remaining sea room past the proposed windfarms, particularly west of the DEP north boundary, as representing an unacceptable risk to navigational safety or have an acceptable and safe width of sea room? Explain with reasons and with reference to these submissions from MCA and the Applicant.

UK Chamber Response:

The area is complex and used by a diverse range of marine users. The Chamber first raised concerns with the negative impact on navigational safety of the proposed sites in August 2018, during the Crown Estate's Round Three Extension consultation. When asked to provide comments and views on the location of the site, the potential constraints that may affect it, and its overall suitability, the Chamber stated in relation to DEP:

The Chamber does not have any specific navigational concerns at this stage given the insufficient information provided on layout or placement of potential turbines however has serious navigational concerns over the suitability of western extent of the northern element to Dudgeon extension and the intersection with a high-density route. Accordingly, the Chamber objects to the full extent of the boundary due to the constriction of safe navigational sea room and does not consider the site suitable.

The above paragraph was submitted to Equinor on 9 June 2021 as part of the UK Chamber of Shipping Response to Dudgeon and Sheringham Shoal Extension Projects Section 42 of the Planning Act 2008 consultation and in the Chamber's assessment this view has not changed.

The Chamber does not have a full charting suite to provide its own diagrammatic analysis of the array area but has estimated the impact of the western extent of the northern array area of DEP would reduce available sea room for two-way traffic into a channel with less than half the size afforded by the current sea space, from approximately 4nm to 2nm. This would not permit vessels to continue to use a safe clearance distance of 1nm from both the wind farm and the shoal and pass another vessel.

The significant reduction in sea room and identification in APP-198 of an average of 16 commercial vessels passing between through the northern channel (Routes 3 & 5), a considerable number, and this is before additional project, offshore, fishing, recreational traffic is taken into consideration, all of which will inevitably increase collision risk.

Upon review of the Applicant's documents to respond to this question, the Chamber has elevated concerns for navigational safety that within APP-198, the analysis undertaken specifically for tankers within the shipping and navigation study area during the survey period is limited. Section "14.1.3.2 Tankers" highlights that an average of 13 vessels per day transit the area and provides that the main destinations recorded were the Humber and mainland Europe. The NRA does not provide any more detailed analysis into tankers, including size, draught, and potential manoeuvrability constraints, including typical passing distance off OWFs. Given the potentially hazardous and environmentally significant cargoes that such vessels carry and their often-restricted manoeuvrability due to length and draught the reduction in available sea room for two-way traffic into a channel less than half the size afforded by the current sea space is a particular concern.

The application of safety zones, which are expected to be used during all phases of the project, have the potential to reduce available sea room by a further 500m if located at the edge of the red line boundary, which can only be expected under the assumption of worst-case scenario. Such a reduction in what is already a very constrained area would further limit traffic and be unacceptable to navigational safety.

In summary, in the Chamber's view, the reduction in sea room between the western extent of the northern array of DEP and the shoaling area does not provide an acceptable width of channel for safe navigation at present.

Holistically, the Chamber believes that for the long-term safe co-location of OWFs and commercial shipping, it is incorrect for developers to foresee the safe distance that mariners transit off OWFs as area for development, as this forces commercial vessels into more constrained areas, passing each other ever closer with increasing collision and allision risk. It is well recognised and accepted by all parties that offshore wind deployment in the UK EEZ is going to continue to increase.

It is highly unlikely that navigational safety will be improved by the presence of a wind farm, so the Chamber strongly advocates that the significant pipeline of planned offshore wind farms avoid and minimise risk to navigational safety as much as possible. Poorly planned cumulative proliferation of offshore wind farms has a strong potential to become an existential threat to the safety of navigation for commercial shipping and have a significant adverse impact on the flexibility and efficiency of shipping industry. Encroachments by developments into busy shipping channels and reduction in navigational safety at this relatively early phase of offshore wind proliferation in the UK EEZ will only be exacerbated in the future.

Q3.19.1.6 - *Disruption or Economic Loss*

Would the Proposed Development location avoid or minimise disruption or adverse transit time changes, including economic loss to the shipping and navigation industries, with particular regard to approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferries, or recreational users of the sea?

UK Chamber Response:

The proposed developments do not directly impact upon approaches to port, nor hinder port access however are located in a busy and complex area for seagoing traffic and marine users, with APP-198 identifying on average 45 commercial vessels passing between the proposed developments each day, whilst excluding project, offshore, fishing, and recreational traffic etc. These vessels comprise strategic routes essential to regional, national and international trade as well as international scheduled ferry services.

Accordingly, any reduction in navigable sea room for vessels to stay a safe distance from infrastructure, natural navigational constraints, and have adequate passing space between vessels to comply with Collision Regulations will have consequences.

Those consequences are numerous; vessels may proceed with greater caution, thereby slowing their speed to delay their passage or operate at a less efficient engine level; vessels may determine that additional crew are required as part of the bridge team to maintain a safe and adequate watch, thereby increasing crew costs and limiting hours of rest on vessels; vessels may ultimately determine that there is insufficient sea room to safely navigate and pass other vessels, and so re-route to avoid the area entirely.

Vessels constrained by draught and manoeuvrability may determine that the available channel between Triton Knoll and Dowsing Shoal, which may be insufficient for their vessel and choose alternative route so as not be constrained.

All these consequences impact adversely on transit times and economic loss to the shipping industry and resulting supply chains. Furthermore, whilst indirect, should a navigational incident (collision or allision) occur in the vicinity then there would be a direct consequence to the parties involved, and knock on indirect impact to other passing vessels and sea users which would inevitably have economic, temporal, and potentially environmental consequences.

Accordingly, to minimise those losses, the view of the Chamber is that the primary means of mitigation is through the lesser reduction in navigable sea room for marine users to safely occupy.

Yours faithfully,



Robert Merrylees
Policy Manager (Nautical & Safety)

UK Chamber of Shipping
 [@ukchamberofshipping.com](mailto:██████████@ukchamberofshipping.com)