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National Infrastructure Planning
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6 July 2023

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

Deadline 7 – Examining Authority’s Written Questions 3

Thank you for inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Secretary of State as part of its assessment of the proposed Sheringham and Dudgeon offshore windfarm extension projects. We would like to submit the following response to the Examining Authority at Deadline 7.

Examining Authority’s Written Questions 4

1. Q4.19.1.2

Size of Ships

The Applicant has stated that the route west of DEP-N (Outer Dowsing Channel) has mainly smaller or mid-sized ships traversing through the area. How does this effect the assessment of collision risk through this area and does it allow more flexibility for routes through for example?

MCA Response:

MCA’s concerns are for when multiple vessels use the Outer Dowsing Channel and surrounding area where the interactions (frequency of encounter) increase with other commercial, recreation, fishing, oil and gas support and wind farm project vessels. Whilst there may be ‘smaller or mid-sized ships’ transiting through the area, we must recognise the sea room must be sufficient to allow the larger vessels found in the area to be able to manoeuvre safely and conduct collision avoidance manoeuvres.

2. Q4.19.1.3

Frequency of Ships Passing

The Navigational Safety Technical Note [REP3-031] states that there are on average 13 ships passing through the Outer Dowsing Channel (west of DEP-N). This could mean that for most times it is unlikely that there would

be more than one ship travelling through this channel adjacent to DEP-N at any one time. How has this been considered in your assessment that concluded that the navigational risk created by the DEP-N site is unacceptable?

MCA Response:

The Navigation Risk Assessment [APP-198] Figure 15.2 and Table 15.1 shows that 16 commercial vessels (cargo and tanker) per day use the Outer Dowsing Channel (Routes 3 and 5). The construction of DEP would increase this number to 17 as Route 9 would deviate from its current route east of Dudgeon offshore wind farm. It is important to note that these numbers do not include other vessel types captured in the traffic survey using the area, specifically recreation, fishing, oil and gas support and wind farm project vessels.

The Applicant indicated there are occasions when multiple commercial vessels use the Outer Dowsing Channel. We must also recognise that vessels use the route south of Triton Knoll offshore wind farm and that the vessels transiting through the area off DEP-North will increase the frequency of encounter. We must ensure that the risks to vessels remain tolerable (if ALARP) or acceptable at all times. It is not acceptable to MCA to say that the risks to vessels are tolerable if, for even a short time, they are exposed to a hazardous area with an unacceptable risk.

3. Q4.19.1.6

Without prejudice mitigation wording

At ISH7 [EV-096] [EV-100] it was suggested that a potential mitigation would be an exclusion of wind turbines and any other associated infrastructure from an area in between and to the west of the Mid-Outer Dowsing buoy and Dudgeon buoy, thus allowing greater sea room. The ExA acknowledges that the Applicant strongly opposes this measure and would not wish it to be proposed. Nonetheless, to aid the ExA's understanding of the possibilities before it, and to inform the SoS's decision, provide the following information without prejudice:

a) *Applicant and MCA, show this exclusion zone on a map/diagram with an easily recognisable title.*

MCA Response:

The image below (Figure 1) shows MCA's recommended 'exclusion area' or reduction to the red line boundary:

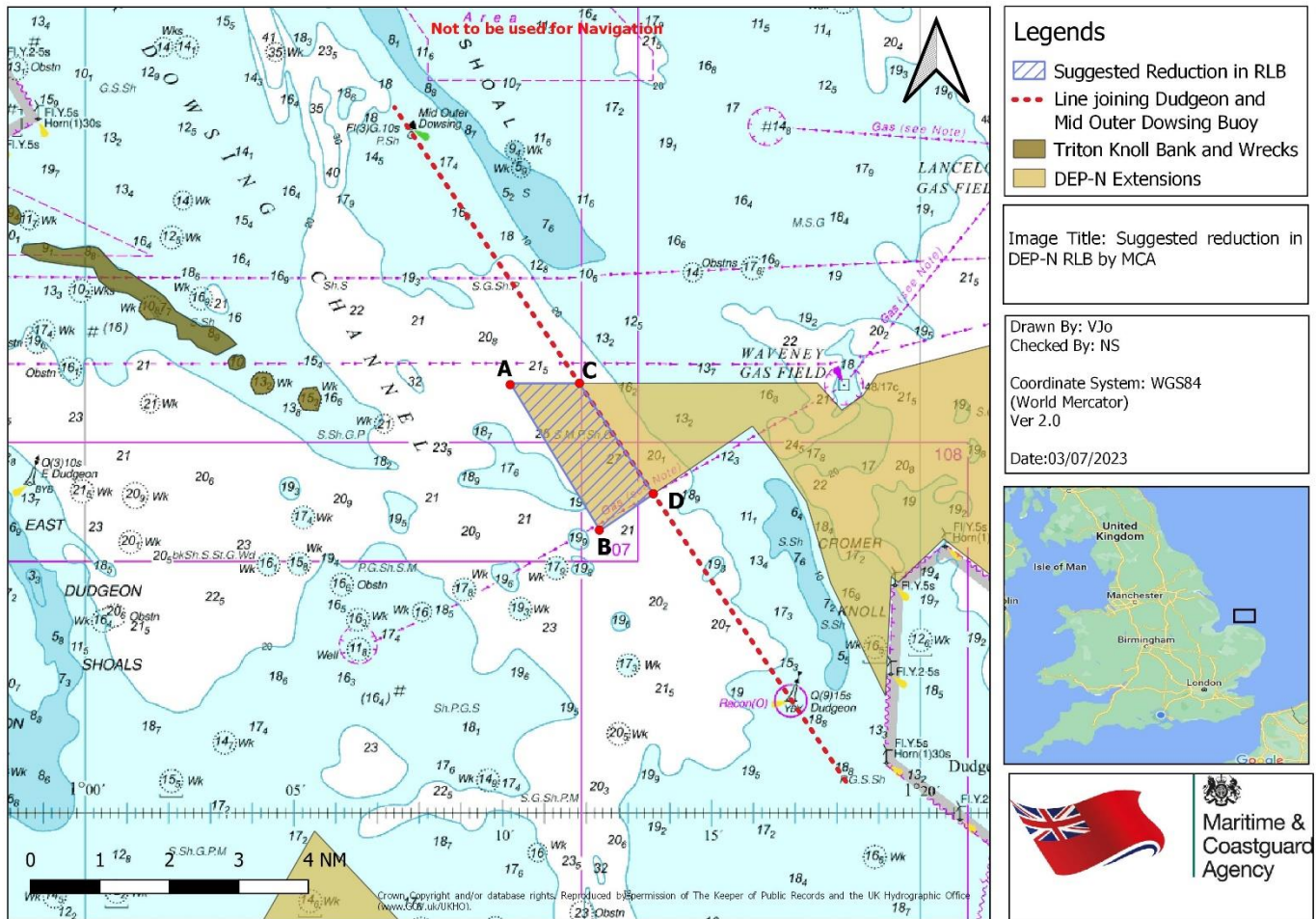


Figure 1 Recommended 'exclusion area' (blue hatched area) or reduction in RLB

- b) In its post Examination considerations, if the ExA considers it is essential to include a provision for an infrastructure free zone in line with MCA's representations (as outlined in Section 7 and Figure 2 (Recommended Boundary Amendment) of their submission at Deadline 5) [REP5-081], Applicant and MCA advise if the map/diagram would need to be included as a certified document or if it should be included in the ES or the Offshore Project Environmental Management Plan.

MCA Response:

MCA would suggest that the image showing the 'exclusion area' is referenced in the DCO as a certified document and included in pre-construction plans and documentation.

- c) Applicant and MCA, provide dDCO drafting, be it a new article, new requirement or amendment to an existing requirement, and any relevant definitions that puts the exclusion zone into effect.

MCA Response:

MCA would suggest that latitude and longitude coordinates of the 'exclusion area' are included in the DCO, for example:

None of the infrastructure listed in Work No. *** may be installed within the area defined by the coordinates as specified below and no part of any wind turbine generator, including its blades, may overfly into the area:

Point ID of the area	Latitude (D°M.MM')	Longitude (D°M.MM')
A (NW corner)	53° 21.1541' N	1° 10.1853' E

<i>B (SW corner)</i>	<i>53° 19.0449' N</i>	<i>1° 12.3327' E</i>
<i>C (NE corner)</i>	<i>53° 19.5696' N</i>	<i>1° 13.6102' E</i>
<i>D (SE corner)</i>	<i>53° 21.1558' N</i>	<i>1° 11.8346' E</i>

This wording is taken from another offshore wind farm DCO where a similar 'exclusion area' was proposed.

MCA would also suggest that pre-construction plans required under the DML conditions e.g. construction programme and Offshore Project Environmental Management Plan, should include details of any works to be undertaken within the 'exclusion area', such as cables, and a timetable of works to be undertaken.

f) Applicant and MCA, to provide responses to the above questions in agreement in a joint statement.

MCA Response:

MCA and the Applicant are not in agreement with the above 'exclusion area' and an agreed joint statement has not been reached.

4. Q4.19.1.10

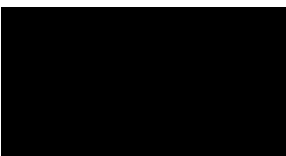
Joint Position Statement

ExA requires a joint position statement from both parties to set out what is a mutually agreeable position to alleviate any navigational risk to ALARP.

MCA Response:

MCA recommends either a reduction to the RLB or commitment to an 'exclusion area' (as above) is required to reduced navigational risks to ALARP. This is opposed by the Applicant and as such, it is unlikely that MCA and the Applicant will reach a mutually agreeable position to alleviate navigational risks to ALARP.

Yours faithfully,



Nick Salter
Offshore Renewables Lead
UK Technical Services Navigation