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To: [AwelyMor](#)
Cc: [Vinu John](#); [Vaughan Jackson](#); [Pete Lawson](#)
Subject: Deadline 1 - MCA Written representation and response to ExQ1
Date: 19 October 2022 15:28:30
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[Written Representation.pdf](#)

Dear Sir/Madam,

Please find attached our Written Representation and response to Examiners Questions 1, as required for Deadline 1.

Best regards,

Nick

Nick Salter

Offshore Renewables Lead
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Safer Lives, Safer Ships, Cleaner Seas

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Your ref: EN010112

19 October 2022

Dear Sir/Madam

Application by Awel y Môr Offshore Wind Farm Limited for an Order Granting Development Consent for the Awel y Môr Offshore Wind Farm Project

Written Representation

Thank you for the opportunity to comment on the Development Consent Order (DCO) application and supporting information for the proposed Awel y Môr offshore wind farm project. The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved, as progress is made towards government targets for renewable energy. The draft DCO, Navigation Risk Assessment (NRA) and the shipping and navigation elements of the Environmental Statement have been reviewed and we would like to comment as follows:

Environmental Statement Volume 4, Annex 9.1: Navigation Risk Assessment

RWE has undertaken a detailed NRA and we are satisfied it has been conducted in accordance with the published guidance, MGN654, and NRA risk assessment methodology. We are satisfied that appropriate traffic data has been collected in accordance with MGN654, which includes twelve months of AIS data in addition to the minimum AIS and radar data requirements. Key and appropriate stakeholders were identified, and we are content that suitable consultation took place via a hazard identification workshop and dedicated meetings. A completed MGN 654 Checklist has been provided as part of the NRA, and we are content the recommended NRA process has been followed. Subject to the agreement and implementation of the requested marine licence conditions submitted to Natural Resources Wales on 9 August 2022, we are content with the NRA conclusions that risks to navigation and SAR will be Tolerable or Broadly Acceptable.

Environmental Statement Volume 2, Chapter 9: Shipping and Navigation

The list of mitigation measures in Table 9 are agreed to be appropriate for the site and we would expect them to be reflected in the conditions of the marine licence.

Cable Routes

Export cable routes, cable burial protection index and cable protections are issues that are yet to be fully developed. However due cognisance needs to address cable burial and protection, particularly close to shore where impacts on navigable water depth may become significant. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. Existing charted anchorage areas should be avoided.

Safety Zones

Construction and operational safety zones will only be granted subject to a detailed justification with significant evidence from the construction and operational phases in addition to the baseline NRA required supporting the case.

Hydrographic Survey Data

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the UKHO and MCA for updating of nautical charts and publications. This should include a cable route survey post-construction.

Turbine Layout Plan

The turbine layout plan will require discussion and approval of the MCA and Trinity House prior to construction commencing. This is to ensure risks to navigation safety and search and rescue operations are minimised.

Draft Development Consent Order

We have one comment on the DCO regarding Schedule 2 - Requirements, Section 3 (Aviation Safety). The undertaker must also consult the MCA on aviation lighting requirements for search and rescue operations. I refer to our guidance document in MGN654 Annex 5 titled: *Offshore Renewable Energy Installations: Requirements, guidance and operational considerations for SAR and Emergency Response*, where under Paragraph 5.6.3 it states:

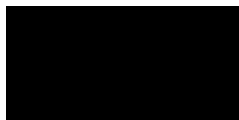
The aviation hazard lighting requirements for wind turbines fall outside of those contained in the Air Navigation Order (ANO). However, the CAA accepts the operational need for different lighting for offshore wind turbines. Developers are therefore requested to write to the CAA to request a derogation from the ANO. The CAA has outlined its position on offshore windfarm lighting in CAP 764 (published February 2016). This document includes MCA requirements for lighting of offshore windfarms. It is important that the developer communicates early-on with the MCA regarding lighting for offshore OREIs.

Conclusion

On the understanding that above requirements will be agreed and implemented, and all maritime safety legislation will be followed, I can confirm we have no objections to the DCO being granted on this occasion.

If you have any questions regarding any of the above, please do not hesitate to contact me or colleagues within UK Technical Services Navigation.

Yours faithfully,



Nick Salter
Offshore Renewables Lead
UK Technical Services Navigation



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Your ref: EN010112

19 October 2022

Dear Sir/Madam

Application by Awel y Môr Offshore Wind Farm Limited for an Order Granting Development Consent for the Awel y Môr Offshore Wind Farm Project

The Examining Authority's written questions and requests for information (ExQ1)

Thank you for your letter dated 27 September 2022 inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Secretary of State as part of its assessment of the proposed Awel y Mor project. The MCA would like to respond to the questions as follows:

12.12 Shipping and Navigation - General

a. Safety zones

Are you satisfied with the ES Volume 2, Chapter 9 [APP-055] and that the maximum design scenario for safety zones of 500 metres around structures during construction, 50 metres around structures which are installed but awaiting further works or commissioning, and 500 metres from structures undergoing major maintenance works are not significant to impede your activities?

MCA response:

MCA would support the maximum design scenario for safety zones of 500 metres around structures during construction, 50 metres around structures which are installed but awaiting further works or commissioning, and 500 metres from structures undergoing major maintenance works and confirms this is in line with common industry practice.

b. Minimum spacing between structures.

Are you satisfied with the ES Volume 2, Chapter 9 [APP-055] and that the maximum design scenario minimum spacing of 830 metres between structures is not significant to not impede your activities?

MCA response:

MCA is satisfied with the minimum spacing of 830m between structures and this has been discussed with the applicant for agreement of the layout principles.

c. Identification of main routes.

Are you satisfied with the ES Volume 2, Chapter 9 [APP-055] and that all main routes (17 in number) have been identified and are as shown on Figure 6?

MCA response:

MCA is satisfied that all main routes applicable to the project have been identified in Figure 6.

d. Use of recognized sea lanes essential to international navigation.

Are you satisfied with the ES Volume 2, Chapter 9 [APP-055] and that the proposed developments do not interfere with the use of recognised sea lanes essential to international navigation?

MCA Response:

MCA is content that the proposed project does not interfere with recognized sea lanes essential to international navigation.

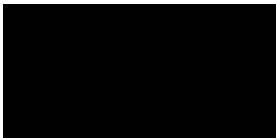
e. Use of recognized sea lanes essential to non- international navigation.

Are you satisfied with the ES Volume 2, Chapter 9 [APP-055] and that any negative impacts on non-international navigation sea lanes are as low as reasonably practicable?

MCA response:

MCA is content that proposed risk controls in APP-055 and Table 19.1 in APP-111 (Navigation Risk Assessment) are accepted as appropriate for reducing risks to as low as reasonably practicable (ALARP). This applies to all shipping routes in the area and is not limited to recognised sea lanes essential to non-international navigation. It is expected that all appropriate risk controls for construction and operation phases will be captured in the marine licence conditions and that there will be consultation with the MCA and other navigation stakeholders, as appropriate, for the post-consent plans.

Yours faithfully,



Nick Salter
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UK Technical Services Navigation