

3 December 2024

To the Planning Inspectorate

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**Application by Mona Offshore Wind Limited for Mona Offshore Wind Farm
The Examining Authority's written questions and requests for information (ExQ2)
Issued on 19 November 2024**

The UK Chamber of Shipping was asked the following question for which it offers response below.

Q2.15.3 - UK Chamber of Shipping - Additional towing capability

Line CoS.SAN.21b of [REP3-028] refers to the potential need for additional towing capability or resource due to the additional risk from cumulative projects in the Irish Sea.

If this matter remains unresolved at Deadline 5, provide elaboration on the point explaining what commitment is sought from the Applicant and why.

The UK Chamber of Shipping further met with the Applicant on 26 November 2024, where the status of Line CoS.SAN.21b in relation to the potential need for additional towing capability was adjusted to the following:

Applicant's Position	CoS Position	Status
<p>As per CoS.SAN.21a but relates to risk control option 10 in Table 46 of the Cumulative Regional Navigational Risk Assessment (CRNRA) (Appendix E of F6.7.1 Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)).</p> <p>Emergency Towing Vessel (ETV) provision was not adopted and was discussed at the hazard workshops and given that vessel allisions were scored as Medium Risk and relatively unlikely, therefore the very high cost of procuring and operating an ETV was disproportionate.</p>	<p>When considering the additional risk from cumulative projects in the Irish Sea over the period of operation (30+ years), the Chamber view is that additional towing capability or resource may be required.</p> <p>The Chamber does not have a position on whether such capability is afforded through dedicated Emergency Towing Vessels as per RCO 10 of Table 46 or via alternative means, for example via project vessels with capability or through the Coastguard Agreement for Salvage and Towing (CAST).</p>	<p>Ongoing point of discussion</p> <p>The Parties met 26/11/24 and agreed the Chamber would consider this matter in responding to ExQ2 Q2.15.3 for Deadline 5. Following Deadline 5, the Parties agreed to reconvene to finalise positions and update the ExA as necessary.</p>

The UK Chamber of Shipping considers that the presence of the cumulative offshore wind farm projects in the Irish Sea, including but not limited to Morgan, Mona, Morecambe and Mooir Vannin, will elevate navigational risk to passing vessels, such that over the lifespan of the projects, there will be value in provision of greater towage capability or resource for safety and emergency mitigation response.

Table 46 of the CRNA discusses the the provision of an ETV for a mitigation response of an allision incident. Such consideration of purely an allision incident, the movement of a vessel into a fixed object (notably a wind turbine or offshore substation platform (OSP)) is correct, but of limited scope to how additional towing resource may be warranted in the area.

In the Chamber's opinion, there are a number of use cases and scenarios where additional towing capability could be utilised. Vessel's may in an emergency situation or situation with a loss of power, determine that anchoring is the safest option to enable them to restart or repair of engines or propulsion systems before proceeding on their journey. Given the presence of considerable area taken with wind farm arrays, and the presence of multiple export cable corridors, the opportunity for vessels to drop anchor and/or drift until restarting engines are limited. This has occurred in the Southern North Sea with vessels requiring European salvage vessels to attend to prevent allision or other danger at considerable cost to the vessel operator and their insurer.

A similar incident occurred in in 2018 with the collision between general cargo ship Saga Sky and barge Stema Barge II resulting in subsea power cables damage, when towage services were unable to be located to assist.

It is entirely reasonable to expect that a similar occurrence may take place in the Irish Sea. Once a ship has broken down and is drifting towards shore, shipping lanes, or offshore structure, a towing vessel may represent the first and only line of defence. The timely provision of assistance invariably needs to take place at short notice and a capable towing vessel is routinely operating within a narrow window of opportunity.

The Chamber acknowledges that this elevation of navigational risk, from the projects cumulatively, is not individually an impact of any one development proceeding through application, rather a collective impact from the significant reduction in overall sea-room for vessels to safely operate. The UK Chamber considers that cumulative risk need to be considered holistically in the Irish Sea and more widely around the UK EEZ with the continued proliferation of offshore wind farms and other offshore renewable activity.

The Maritime & Coastguard Agency (MCA), as an executive agency of the Department for Transport (DfT), provides a 24-hour maritime and coastal search and rescue emergency coordination and response service for the United Kingdom. The MCA has a duty on behalf of the UK Government to regularly reassess the risk in UK waters from shipping related risk.

Four Emergency Towing Vessels (ETVs) were deployed around the UK following Lord Donaldson's report on the Braer tanker disaster off Shetland in 1993, but their numbers were reduced to only one as part of a comprehensive spending review in 2011. In combination with the centralised ETV provision, the MCA introduced CAST, MCA's Coastguard Agreement for Salvage and Towage in 1997.

This enables the MCA to call upon the services (subject to availability) of local towage providers to assist in salvage operations were a vessel is in danger of causing pollution, danger to other shipping or to assist in counter pollution duties. Following the abovementioned 2018 incident, the DfT commissioned a report undertaken by [Frazer-Nash and published in April 2020](#), on the UK EEZ Shipping Risks and Emergency Towage Provision Study.

The report considered ETV provision from the position of mitigation of risk from pollution, and found evidence that the commercial towage market had not responded in the way it was originally envisaged to fulfil the gap left by the removal of ETVs in 2011, while the UK maritime environment had “increased in complexity over the same period of time”.

In the Chamber’s perspective, given the commissioned report only considered ETV provision and CAST from a pollution mitigation perspective, not a wider range of risks, and that the proliferation of offshore renewable energy development in the UK EEZ was not within scope, there is a wider navigational risk that has not been assessed which requires addressing.

In conclusion, the Chamber’s requested action is that the Examining Authority recognise the holistic navigational risk increasing from cumulative offshore renewable development, in particular in areas of high traffic and development density. The Chamber recommends that there be a review by relevant regulators, stakeholders, leasing authorities, and developers to examine towing resource in the UK EEZ recognising the Government’s ambitious targets for offshore renewable energy and the increasingly complex maritime environment.

The Chamber considers this recommendation to be wider than that of the Applicant individually and does not preclude consent.

More specifically to the development, the Chamber would recommend the Examining Authority request the Applicant undertake analysis into towage availability from third parties provided commercial in the vicinity to the projects, and what the likelihood of their project vessels having towing capability to assist in an incident.

The Chamber trusts these responses meet the Planning Inspectorate’s expectations but can provide further representation where appropriate.

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Policy Manager (Safety & Nautical) & Analyst