Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to UK Chamber of Shipping ExQ2 Submission

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F01

Image of an offshore wind farm

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Prepared for:

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Contents

Tables

Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.

Acronyms

Acronym	Description
ALARP	As Low as Reasonably Practicable
CAST	Coastguard Agreement for Salvage and Towage
CoS	Chamber of Shipping
CRNRA	Cumulative Regional Navigational Risk Assessment
DfT	Department for Transport
EEZ	Exclusive Economic Zone
ETV	Emergency Towing Vehicle
MCA	Maritime and Coastguard Agency
NRA	Navigational Risk Assessment
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
SoCG	Statement of Common Ground
VTMP	Vessel Traffic Management

1 Response to UK Chamber of Shipping ExQ2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to UK Chamber of Shipping responses to ExQ2 below.

2 Response to UK Chamber of Shipping ExQ2 Submission

Table 2.1: REP5-124 UK Chamber of Shipping

<table>
<tr><th>Planning Inspectorate Ref. No.</th><th>Question to</th><th>ExQ2 Question</th><th>UK Chamber of Shipping response</th><th>Applicant's response</th></tr>
<tr>
<td>REP5-124.1</td>
<td>UK Chamber of Shipping</td>
<td>Q2.15.3 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.</td>
<td>
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:
<table>
<tr><th>Applicant's Position</th><th>CoS Position</th><th>Status</th></tr>
<tr><td>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)).

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.</td><td>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.

The Chamber does not have a position on whether such capability is afforded through dedicated Emergency Towage 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 Towage (CAST).</td><td>Ongoing point of discussion

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.</td></tr>
</table>
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.
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<td>
The Applicant highlights that the Statement of Common Ground (SoCG) with the UK Chamber of Shipping (CoS) submitted at Deadline 5 (REP5-051) notes agreement on all matters relating to shipping and navigation with the exception of the role of ETVs in the Irish Sea in a cumulative context (see CoS.SAN.21b). Similarly, the UK CoS response to ExQ2.15.3 (REP5-124) notes that it is drafted in the context of the cumulative scenario with the four proposed offshore wind projects in operation (Mona Offshore Wind Project, Morgan Generation Assets, Morecambe Generation Assets and Mooir Vannin Offshore Wind Project). The UK CoS and the Applicant are agreed that the risks associated with the Mona Offshore Wind Project in isolation are managed to Tolerable and As Low as Reasonably Practicable (ALARP) as demonstrated through Volume 6, Annex 7.1: Navigational Risk Assessment (NRA) (APP-098) and hazard workshop attended by the UK CoS.

The Applicant's position is that ETVs are not required, address a rare event, have limited effectiveness and are highly expensive, and would therefore not be proportionate to the risks:

• NRA results: During the hazard workshop as reported in the NRA (APP-098) it was concluded that the risks associated with the Mona Offshore Wind Project and other Tier 1 and Tier 2 projects Tolerable if ALARP. The amendments to the boundaries had improved the searoom and increased the passing distances between shipping routes and the Array Areas.

• Low likelihood: The likelihood of a ferry becoming disabled and drifting into an OWF is very low. Ferries are well maintained and have good redundancy should mechanical failure occur. There are very few reported incidents occurring in close proximity to existing OWFs in the Irish Sea.

• Difference from base case: The Applicant notes that at present ferries already pass in close proximity to OWFs in the Irish Sea with many passage plans keeping similar passing distances from e.g. Walney wind farms, West of Duddon Sands, Gwynt-y-Mor. The Applicant is not aware of any previous suggestion that ETVs could be required in this context.

• Difficulty in attaching tow: Even in situations where an ETV has reached a casualty vessel, attaching a tow line can be both challenging and dangerous. For example, the Julietta D incident which occurred in 2022 in the Netherlands took several hours to attach a tow and resulted in several injuries. Attempts of an ETV to establish a tow off the Dutch coast on 07 December 2024 during Storm Darragh were called off after a crew member was injured requiring airlifting to hospital. A similar incident off France on the same date took five hours to establish a tow. Furthermore, in the most significant incident which occurred in the Irish Sea, the loss of the Riverdance in 2008, it would have been highly dangerous to attempt to establish a tow. Therefore, there is no guarantee that an available ETV would stop an incident occurring.

• Potential increase in risk: The presence of an ETV in the study area potentially increases the risk of collision with passing vessels and allision, were the ETV to get into difficulty, and therefore could be a net negative on navigational safety.

• Response time: ETVs are most effective when they are immediately available to respond to an incident. Given the proximity of the ferry routes to the OWFs, and noting the above on difficulties in attaching a tow, a single ETV roaming the Irish Sea may still not get to a casualty vessel in time to attach a tow and prevent an incident.
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Planning Inspectorate Ref. No.	Question to	ExQ2 Question	UK Chamber of Shipping response	Applicant's response
			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 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 a incident. The Chamber trust these responses meet the Planning Inspectorate's expectations but can provide further representation where appropriate.	• **High cost**: ETVs are highly expensive and this was the main reason the UK government withdrew the UK's ETV programme in 2010 as noted in the UK CoS response to ExQ2.15.3 (REP5-124). • **Unprecedented**: The Applicant notes that such a requirement has not been made on any other OWF (or group of OWF) in the UK and would set a significant precedent to the industry. The UK CoS response to ExQ2.15.3 (REP5-124) notes several recommendations including a review for the need for additional towage resource in the UK Exclusive Economic Zone (EEZ). The Applicant would welcome such a review but notes that it would not be appropriate for the Applicant to lead such an assessment and would expect this recommendation to be directed to the MCA, which as noted by the UK CoS, is the relevant navigational authority for the study area and has an obligation "*to reassess the risk in UK waters from shipping related risk*". Importantly the UK CoS does not consider that this recommendation precludes consent. The UK CoS response to ExQ2.15.3 (REP5-124) also recommends an analysis of towage in the region is undertaken by the Applicant and how Mona Offshore Wind Project vessels having capability to tow disabled vessels: • With regards to an analysis of towage in the region, the Applicant does not believe that such a study is warranted. The NRA (APP-098) has concluded that the risks associated with the Mona Offshore Wind Project are managed to be Tolerable and ALARP. The Applicant has considered the role of towage in responding to an incident and as noted above has concluded that they have limited effectiveness. Therefore, the Applicant does not consider that such a study would clarify any outstanding matters as part of the Mona Offshore Wind Project Examination. • With regards to the Project vessels towing capability, the Applicant's Outline Vessel Traffic Management Plan (VTMP) (REP3-018) includes relevant sections for the specifications of vessels to be set out which would include their towing capability where appropriate. The Applicant has updated the Outline VTMP at Deadline 6 to explicitly include the review of towage capability of Project vessels to further address this concern (J14 F03). This has also been discussed and agreed with the MCA and will be reflected in the final SoCG between the Applicant and the MCA at D7.