

- 8 JUL 2020

The Planning Inspectorate,
National Infrastructure Directorate,
Temple Quay House,
Temple Quay Bristol,
BS1 6PN

06 April 2020

Dear Sirs,

APPLICATION FOR A DEVELOPMENT CONSENT ORDER, THE PROPOSED HORNSEA PROJECT THREE OFFSHORE WIND FARM ORDER (APPLICATION REFERENCE EN010080)

We refer to the above Application of which we have received notice and as requested therein provide our comments as follows.

Terms used in this letter shall be given the same meaning as given in the subject Application unless the context requires otherwise.

This letter is written by us in our capacity as the operator of the Esmond Transmission System ("ETS"), and for and on behalf of the owners of ETS.

We have an interest in the subject Application on the basis that Hornsea Three involves a proposed crossing of and working alongside the ETS (the "**Works of Interest**").

ETS is one of the largest UK Southern North Sea natural gas transportation systems which transports and delivers a significant proportion of UK produced gas; presently from three connected gas fields. The ETS is classified as a "Major Accident Hazard" pipeline and is subject to stringent legislative controls. The Applicant should also be aware that the Health and Safety Executive (HSE) is a statutory consultee for planning applications around major hazard sites and pipelines and therefore require to be consulted with regards the Application in this regard.

ETS is essential national infrastructure. Accordingly, any incident which results in damage to ETS, or which would require the ETS to shutdown would have significant and detrimental impact upon UK gas and electricity supplies to consumers in the commercial and domestic UK markets.

We therefore seek assurances that this Application would not create an ongoing risk to the continued safe and reliable operation of the ETS, and not restrict access to the ETS for purposes of its repair, inspection and/or maintenance. The ability to have unrestricted access at all times to repair, inspect and/or maintain the ETS is required to enable us and the said owners of ETS to comply with statutory obligations.

We would therefore request assurances from the Applicant in relation to the following matters:

In respect of the Works of Interest comprising crossing of the ETS, a Pipeline Crossing Agreement ("**PCA**") will be required to be entered into between the Applicant and the ETS owners. This PCA



should take the form of the UK Oil and Gas latest Industry Model Form of Pipeline Crossing Agreement, which sets out required controls, operational protocols, and the liability and indemnity regime associated with the Works of Interest. Suitable and sufficient time is required to develop and agree the PCA to ensure it is fully executed prior to the commencement of the Applicants said crossing works.

The Applicant is required to demonstrate suitable and sufficient mitigations to ensure there is no interference with ETS, and should include the following measures:

- Marking of the ETS on appropriate construction drawings highlighting safety zone, with appropriate warnings of high hazard pipeline.
- Marking of the ETS pipeline route in the vicinity of the pipeline crossing/offshore booster station with navigation warning buoys.
- Assurance that anchor patterns for vessels associated with the Application works do not interfere or risk interference with the ETS or enter its pipeline safety zone. Note: In addition to the PCA, proximity agreements would be required to be entered into between Applicant and ETS owners if the Works of Interest involves anchors being laid within the ETS pipeline safety zone: such proximity agreement(s) would also require to follow the form of the UK Oil and Gas latest Industry Model Form of Proximity Agreement and would need to be agreed and executed prior to the commencement of the Hornsea Three offshore works conducted in proximity to the ETS (but excluding those works covered by the PCA).

The ETS pipeline spanning risk is significant in the area proximate to the Applicants proposed cable crossing and HVAC offshore booster station location forming part of Hornsea Three. A significant span remediation intervention was conducted in December 2019 at 3 locations between the ETS pipeline route, KP-164 and KP-167. We believe this is within 5km of the cable crossing location, and similar proximity to the proposed offshore HVAC booster station.

We therefore have a concern that Hornsea Three could adversely impact the seabed movements in proximity to the ETS (due to the cable lay, pipeline crossing protection, and/or location of the HVAC offshore booster station) – resulting in accelerated spanning/ increased risk to parts of the ETS. The Applicant is therefore requested to demonstrate to us its modelling of dynamic sand wave / sand bank movement in this area to show no adverse impacts to ETS in this regard.

Subject to our above comments the ETS owners are, in principle, supportive of the Application. The ETS owners would, however, expect to be fully consulted on all aspects of the programme to ensure the continued safe operation and integrity of the ETS.

Yours Faithfully,



Stefan Kent
Asset Support Manager
Kellas North Sea 2 Limited
As operator of ETS and on behalf of the ETS owners



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