



Maritime &
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Agency

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Your ref: EN010087
Our ref: Boreas Offshore Windfarm
Project

10th December 2019

Dear Sir/Madam

Norfolk Boreas Project – EN010087

The Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010

Rule 8 letter giving notice of the procedural decisions made following the Preliminary Meeting - Deadline 2 Response: ExQ1

Thank you for the opportunity to respond to your Rule 8 letter giving notice of the procedural decisions made following the Preliminary Meeting, and to provide a written submission at Deadline 2.

Written Representation

The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved, and our search and rescue capability is maintained, whilst progress is made towards government targets for renewable energy. We have assessed the process by which the applicant has undertaken the Navigation Risk Assessment (NRA) and Shipping and Navigation Chapter of the Environmental Statement, in accordance with MCA guidance contained in Marine Guidance Note MGN 543, and we are content that our requirements have been followed.

There are two items the MCA would like to highlight at this stage:



HM Coastguard

1) Draft DCO and DML

The MCA and the applicant are currently working on some remaining DCO/DML condition wording, which are not yet agreed.

The MCA expects the hydrographic survey requirements to be undertaken in accordance with Marine Guidance Note 543 and its hydrographic survey guidelines, and the applicant is currently considering how it is going to achieve these requirements.

The MCA has also agreed a standard set of navigation safety conditions with the Marine Management Organisation and Trinity House, which we expect to be applied to all renewable projects to ensure the safety of navigation. These include specific timeframes for issuing local notices to mariners, timescales for notifying the UK Hydrographic Office for dissemination of MSI (Maritime Safety Information) by appropriate means for adequate geo-spatial coverage, and notification timescales for any cable exposure. These aspects are all currently not yet agreed by the applicant as per Statement of Common Ground with MCA.

2) Layout

As detailed in the Statement of Common Ground, the 'Layout Design and use of Development Principles' section is listed as agreed. We would like to highlight that this is purely in relation to the process for achieving layout acceptance and is by no means any layout agreement.

We note that the NRA assesses just one 'line of orientation'. Our requirement as per MGN 543 is for two lines of orientation, however there is scope to consider bespoke safety justification which demonstrates why just one line of orientation may be acceptable from the safety of navigation and Search and Rescue perspective. The MCA request that every endeavour should be made by the applicant to accommodate two lines of orientation. Multiple lines of orientation provide alternative options for vessel passage planning as well as reduction in traffic density. We know that by far the safest way to navigate through a windfarm is when the turbines are in straight lines, with multiple lines of orientation, which gives a clear line of sight of entry and exit. We also must consider the mariners who find themselves in the vicinity of a windfarm in an emerging situation, or in adverse weather and visibility conditions.

Examining Authority's Written Questions and Request for Information (ExQ1)

In response to the Examination Authority's first written questions, issued on 19th November 2019, the MCA's answers can be found in the attached table.

Initial Statements of Common Ground

The MCA has worked with the applicant and has agreed a current position for all aspects of the SoCG. This has been signed by MCA and submitted to the ExA by the applicant.

Notification of wish to make oral representations at the Issue Specific Hearings in January 2020

On this occasion at this stage, the MCA does not believe our attendance, or any oral representations by MCA, are required at any Issue Specific Hearings. However, should our requirements regarding the wording of the DCO/DML (as detailed above) not be addressed by the applicant to our satisfaction, the MCA may look to attend any future DCO/DML Issue Specific Hearings.

Yours faithfully,

Helen Croxson
OREI Advisor
Maritime and Coastguard Agency