

16 January 2025

To the Planning Inspectorate

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Application by Morgan Offshore Wind Limited. Morgan Offshore Wind Project: Generation Assets

The Examining Authority's written questions and requests for information (ExQ2)

Issued on Thursday 19 December 2024

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

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| SN 2.1 | <p>Isle of Man Territorial Sea Committee</p> <p>Maritime and Coastguard Agency</p> <p>UK Chamber of Shipping</p> | <p>Guidance on navigational route width in IoM territorial waters</p> <p>The IoM Harbours Division (through the IoM Government TSC), the MCA and the UK Chamber of Shipping are invited to advise on any or all of the following:</p> <p>i Whether the World Association for Waterborne Transport Infrastructure (PIANC) WG161 recommendations on shipping route width as described in the Applicant's Cumulative Regional Navigational Risk Assessment [APP-060] (Appendix E, Section 7.6) is applicable to navigation within Manx territorial waters between the Proposed Development and the proposed Mooir Vannin OWF array. If not, why not?</p> <p><i>The Chamber considers the PIANC WG 161 recommendations as an appropriate guide in the circumstances, notwithstanding that site specific attributes may warrant further or enhanced mitigations to maintain navigational safety.</i></p> <p>ii Are the PIANC WG161 recommendations endorsed by the International Maritime Organisation?</p> <p><i>The Chamber defers expertise to the Maritime and Coastguard Agency (MCA) as they are the UK delegation at IMO, to respond to this question.</i></p> |
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| | | <p>iii Whether there are any contradictions between these PIANC WG161 recommendations and MGN654.</p> <p><i>The UK Chamber of Shipping defers to the MCA for this question.</i></p> <p>iv Whether there been any further related guidance on marine spatial planning for the interaction between maritime navigation and offshore windfarms produced since that 2018 PIANC WG161 report.</p> <p><i>The Chamber is not aware of further related guidance on this matter, however shares the report issued by the Dutch Safety Board in June 2024 titled “Compromise on room to manoeuvre. Managing the safety of shipping in an increasingly crowded North Sea”. The report investigates the risks associated with the increasing use of the North Sea and the effect this has on the safety of shipping in the area, finding that space and available searoom to manoeuvre in an emergency is paramount, especially for wind-sensitive vessels. The report may be found via: https://onderzoeksraad.nl/en/onderzoek/intensified-use-north-sea/</i></p> |
| SN 2.3 | <p>Isle of Man Territorial Sea Committee</p> <p>Moor Vannin Offshore Wind Farm Limited</p> <p>Stena Line</p> <p>UK Chamber of Shipping</p> | <p>Design vessel length in relation to PIANC guidance for safe passage space</p> <p>The IPs listed are asked to comment on what would be a reasonable ‘design vessel’ length overall (LOA) to be applied in relation to the PIANC guidance on route width as discussed in [APP-060, Appendix E, Section 7.6] considering the vessels expected to transit the sea space between the Proposed Development and the proposed Moor Vannin OWF, either on passage to or from the Port of Douglas or on passage past the east and north of the Isle of Man.</p> <p><i>The Chamber consider that as paragraph 7.6.2.1.4 of the CRNRA states that vessels up to 300m in length are recorded as transiting these routes, that a design length no less than 300m should be used.</i></p> |
| SN 2.4 | <p>Maritime and Coastguard Agency</p> <p>Moor Vannin Offshore Wind Farm Limited</p> <p>Stena Line</p> <p>UK Chamber of Shipping</p> | <p>Precedent for restricted navigation corridors past OWFs</p> <p>The ExA invites comment from the listed IPs on the discussion of UK precedent for restricted channels between windfarms presented in [APP-060, Section 7.6 of Appendix E] as expanded in the Applicant’s Annex 3.1 to responses to ISH2 Action Points [REP4-005] and invites suggestion of any other relevant precedent (whether or not flanked on both sides by offshore wind turbine arrays) of navigation route ‘corridors’ of restricted width, outwith ports and harbours.</p> <p><i>The Chamber is in full agreement with conclusions of the Morgan Generation Assets hazard workshop held 29 September 2023 that there was insufficient searoom (2.6nm) between Morgan and Moor Vannin and therefore an unacceptable risk of collision and allision existed.</i></p> <p><i>The Chamber recognises the projects included in the applicant’s submission S_D4_3.1, all of which have specific circumstances and factors that have enabled their consent. However it should recognised that whilst such “corridors” may have been consented, only two out of the seven precedent are operational</i></p> |

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| | | <p><i>and accordingly being navigated by vessels. One of those seven (Gallopier-Greater Gabbard) is immediately adjacent to IMO Traffic Separation Scheme routeing measures whereby vessel traffic is closely controlled in tandem with Vessel Traffic Services and cannot be considered a reasonable comparison.</i></p> <p><i>The other cases whilst deemed Tolerable if ALARP at planning are not constructed nor in use and so precautionary consideration should be given until lived experience. Due to the unprecedented situation of multiple developments being examined for consent simultaneously with construction and operation in parallel, it will not be for some time until planning decisions on navigational safety will be tested and lived with by vessel operators who then are exposed to the risk for every crossing.</i></p> <p><i>The Chamber is aware and welcomes Morgan's undertaking of further navigational simulation exercises in relation to an expanded "gap" between Morgan and Mooir Vannin proposed developments to consider navigational risk which it expects will factor the full range of weather conditions, varying traffic levels, and emergency response.</i></p> |
| SN 2.7 | <p>Maritime and Coastguard Agency</p> <p>Stena Line</p> <p>UK Chamber of Shipping</p> <p>Any Other Interested Parties</p> | <p>Security for continuation of the Marine Navigation Engagement Forum</p> <p>The listed IPs are asked to confirm if they consider that adequate security for post-consent stakeholder engagement would be provided by Commitment Co72 in the Commitments Register [REP4-025] which commits to continued engagement of the Marine Navigation Engagement Forum (MNEF) post-consent, and if not, why not.</p> <p><i>The Chamber welcomes the continuation of the Marine Navigation Engagement Forum (MNEF) post consent. The Chamber considers that Morgan should commit, as Mona Offshore Wind Farm has done at Examination, to engage with the MNEF five years into the operations and maintenance phase rather than the lack of clarity as presently presented.</i></p> <p><i>The Chamber considers the MNEF should have specific targets and objectives to be determined by the members, but not limited to the developers' sharing knowledge, best practice and expertise with third parties, for example the IMO, PIANC, IALA, as well as the Crown Estate Offshore Wind Evidence and Change Programme to de-risk future development.</i></p> <p><i>The Chamber also considers that an agreed means of redress should be considered for MNEF members so that legitimate concerns or impacts yet to be known or materialise may be escalated and meaningful remedial action taken as appropriate.</i></p> |

