

British Wind Energy Association response to the consultation by the Maritime and Coastguard Agency on Proposed UK Offshore Renewable Energy Installations (OREI) – Guidance on Navigational Safety Issues.

The BWEA welcomes the MCA's consultation on this guidance on navigational safety assessment, as it is vital that all parties are clear on what is best practice in the area. However, the Association would welcome further clarification of the status of this document, as, while it is described as guidance, there appear to be sections that are requirements rather than recommendations. In addition, the BWEA would welcome an assurance that when the MCA reviews the guidance (as described in para 3.8), the offshore renewable energy industry will be fully consulted.

The MCA and the shipping sector generally should note that there are many constraints placed on the offshore wind industry, which may make navigational safety requests, for example to move projects even a few kilometres, difficult to carry out, though of course developers will do all possible to mitigate any navigational risks. The balance of importance assigned to navigational issues vis-à-vis all other issues is of course addressed during the consenting process. BWEA members look forward to using the final form of these guidelines in the consenting process, when preparing their scoping reports, EIAs and resulting ESs.

Annex 1 – Considerations on Site Position, Structures and Safety Zones

1. Traffic survey

The listing of what traffic surveys should cover is useful. The BWEA believes, however, that there should be flexibility in application of this list to account for site-specific factors: in some places not all the issues will apply, while others not on the list may need to be looked at.

2. OERI structures

The BWEA finds this section acceptable.

3. Access to and Navigation Within, or Close to, an OERI



The classification of conditions under which vessels could navigate within OREIs or need to be excluded is useful. It is important to note that if the effect of an OERI assessed under point (c) so great on shipping (through extra diesel used, cargoes having to be left behind, and extra time at sea) that a lane through the site be thought necessary, this would require a thorough risk assessment.

Annex 2 – Navigation, Collision Avoidance and Communications

The BWEA welcomes this Annex generally as the guidance is appropriate and useful. Our only comment is on Communications, Radar and Positioning Systems, where we would welcome MCA assurance that it will give advice on what constitutes acceptable research; for instance, would generic research into radar or other interference be accepted, or would site-specific studies be required?

Annex 3 – Examples of additional marine routing safety measures recommended to establish in association with wind farms during operation

The BWEA is concerned about the status of the entries in this Annex. The title describes the measures as ‘Examples of additional...measures recommended...’. Does the MCA expect all these recommendations to be followed? If not, under what conditions would the MCA expect them to be applied?

The classification of wind farms into Lower, Medium and Higher Risk categories on the basis of water depth is not particularly useful, as very few wind farms will be in less than 3 metres of water, and indeed most will be in more than 7 metres. Will all those be classed as “higher risk”? BWEA believes that higher risk can only be assigned in light of traffic surveys and other assessments described in Annexes 1 & 2. The proximity of shipping to a wind farm is surely a better measure of the risk category, but “close to shipping lanes” not defined in this Annex.

BWEA accepts that it may be necessary for existing communication systems to be augmented in the vicinity of wind farms to maintain their effectiveness, and that the reasonable cost of the additional equipment should be borne by the developers of the wind farms. However, we are concerned that some of the measures in this annex may be unrealistically onerous or impractical, or even unnecessary in practice. Studies are being undertaken into the effect of offshore wind farms on navigation radar and VHF communications, the results of which should be available before any Round 2 wind farms will have applied for consent. Wind farms have not yet been proved to be a serious issue for radar and VHF communications.

In general, the Association accepts additional safety measures where they are shown to be necessary, but the measures in this Annex seem overly prescriptive given the current sketchy state of knowledge. For instance, the use of guard ships (3(iv)) appears to be excessive without reference to a risk assessment that indicates their necessity. The application of Areas to be Avoided was referred to in Annex 1 as a possibility – what is the status of such applications here? Is MCA saying that ABTAs should be automatically applied to “higher risk” wind farms?

Annex 4 – Standards and procedures for wind turbine generator shutdown in the event of a search and rescue, counter pollution or salvage incident in or around a wind farm

Once again, the BWEA believes the status of this Annex needs to be clarified, as the measures in it seem to be prescriptive rather than for guidance purposes.

1) Design requirements

The section on markings (1(i)) is generally to be welcomed, though the requirement for illumination may be excessive.

The main BWEA concern here is with the recommendations on emergency shutdowns, however. Existing wind turbines can be shut down by remote control, but doing this within 60 seconds is referred to as a hard shutdown, which is considered to be detrimental to the turbines and to reduce their operational lives. Some turbine designs may not be able to shut down in 60 seconds. It will not be possible to shut down all the turbines in a wind farm in 60 seconds, although it may be possible to shut down those within, say, 1 kilometre of an incident in that sort of timescale. Hard shutdowns should only take place in a real emergency and only rarely for test purposes.

The BWEA appreciates the comment in 1(iii) that turbine shutdowns should be limited both in terms of number of turbines and length of time; any shutdown will reduce a wind farm's revenue, and also extensive shutdowns would have knock-on impacts on the wider power system (need for backup, power flows, etc).

It is unclear why the guidelines call for fixing the position of blades during shutdown in the 12/4/8 or 2/6/10 positions. The key issue in an emergency should surely be the speed with which rotation can be stopped, not where the blades finally rest? Specifying positions could be an objective but should not be required.

2) Operational requirements

The BWEA agrees with these recommendations.

3) Operational procedures

Operational procedures in the case of emergencies must be agreed and tested with relevant services. However, the BWEA feels that a single test of shutdown procedures each year, limited to a small number of turbines, should be sufficient. Communication procedures can be tested more frequently, perhaps twice a year as the draft suggests.