

Response by The Port of Mostyn to Hynet CCS PROJECT Liverpool Bay

NRW Application Ref CML2365

Volume 2 - CHAPTER 9 – SHIPPING & NAVIGATION

5. Consultation - Table 5.1

The impression that a detailed consultation took place between The Port of Mostyn (Mostyn) and the Applicant's representatives is incorrect. The consultation, held jointly with Mostyn, Trinity House and MCA representatives consisted of a Teams call at which only an overview of the project was provided. Mention was made of two potential cable routes from the offshore installations to the Point of Ayr landfall site, however no details about the trenching, cable laying or burial operations planned across the Welsh Channel were provided. This lack of details limited Mostyn's ability to make informed comments at the time about the proposed project.

Any obstruction of the navigational channel is bound to have serious consequences for Mostyn's business therefore the Applicant should be required to commit to robust measures to ensure disruption by the cable laying operations in the Welsh Channel is minimised and will be subject to prior consultation and agreement with Mostyn.

Applicant response: It is acknowledged that the consultation call held on 29th June 2023 jointly with Port of Mostyn (PoM), Trinity House, and the MCA was only a short call to provide an update on the latest configuration of the proposed project elements and the construction, and the potential timing of the planned permit and licence applications. Feedback from Captain Jackson, PoM Harbour Master, highlighted that the proposed wind farms in the area may lead to an increase to wind farm vessels, including potential for construction vessels using the port. This is recognised by the Applicant and has been considered in the future baseline Section 9.10 of the Navigational Risk Assessment (NRA).

In addition to the consultation meeting noted, two presentation meetings were held with PoM representatives. The first on Thursday 9th June 2022, and second on Thursday 11th May 2023, each involving ENI engineers from the project team, and members of the Port of Mostyn team.

The first meeting in June 2022 took place in person between Mark Smith (ENI's Construction Engineer) and Captain Rob Jackson – Harbour Master (Port of Mostyn) and Danny Davis – Deputy Harbour Master.

At this initial meeting, Mark Smith provided a presentation of the project, including the cable lay (location, length, burial) from Point of Ayr to the offshore field.

Also, at this meeting information was received by ENI from the Harbour team. This included: -

- Current port traffic;
- Potential future activity for the Port, including work being tendered;
- Dredging history/programmes for the Welsh Channel and the Port Entrance Channels;
- Characteristics of the West Hoyle Spit.
- Piloting vessels through the Welsh Channel.

The second meeting held in May 2023, via Teams was between Captain Rob Jackson (Harbour Master), Mark Smith and Borisa Curic (ENI's Marine/Naval Engineer). The purpose of this subsequent meeting was to update the Harbour team on the project development, and for project to gain further information on the Welsh Channel, including current proposed traffic, tide information, current speeds, and dredging activities.

Information received from the Harbour team at both meeting was well received and appreciated by the ENI project team.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay. The cable lay operation is key component of the project, providing electrical power (33kV) to the offshore field.

ENI has since had an in-person meeting on 26th June 2024 with representatives of PoM, to provide an update of the planned activities that have evolved since the Marine Licence application was submitted. Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions can be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

9.7.4. – Vessel Traffic Overview

- (1) The Application quotes the average draft of vessels using the study area as being 4.5m. however vessels using Mostyn have not been included. For completeness, we can advise that a large proportion of the vessels navigating to Mostyn through the Welsh Channel are CTVs with drafts of less than 3m. Deeper drafted general cargo ships, jack-up vessels, vessels under tow and wind turbine platforms subject to RAM will also be in transit through the channel. A separate assessment of the drafts of vessels using the Welsh Channel would therefore provide a more accurate average draft of vessels in the wider study area.

Applicant response: ENI will update the NRA and the *ES Chapter 9: Shipping and Navigation* to incorporate the details of the vessel types and movements at PoM that have been provided in this consultation response from PoM and were omitted from the submitted assessments. Additional information on Welsh Channel vessel movements added in Section 9.9 of the NRA and section 9.7.4 of the ES chapter and considered in the impact assessment.

Additionally, once the cable installation contractor has been appointed, a separate assessment of vessel drafts using the Welsh Channel will be undertaken prior to the commencement of the marine works. We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval. VMP and construction plan to be agreed with PoM added as embedded mitigation (section 9.10 of chapter)

- (2) The MHWS tidal range in the Dee estuary is 8.9m. – the designed dredged depth of the Welsh Channel is -5m C.D. therefore when it is re-dredged to depth it is expected that vessels with drafts up to 11m and an UKC of 1.5m will transit to and from Mostyn from mid-2026 onwards; this has not been included in the assessment of the cable laying activities.

Applicant response: Information is understood and has been clarified in section 9.10 of the NRA.

Tidal range is considered for vessel operations. However, the channel does not represent operational challenge for proposed cable lay vessel, only that part of the cable route outside of the navigation channel where water depth is LAT is 0.0-0.5m.

It should be noted that the depth of burial is specified in the FEED document *1025H0BSRV84107 - OFFSHORE POWER CABLE PROTECTION REQUIREMENTS*. This reports that the cable burial risk assessment has identified that the cable must be buried to a depth that will allow necessary (maintenance) dredging activities in future. The specified burial depth is 3 metres below the seabed, as per the existing gas export pipeline PL1030, and will provide the clearances required.

- (3) The Study Area includes the Welsh Channel however Figure 9.6 shows the average daily vessel count for the Mersey ports only, Mostyn data has been omitted. Allowing for 10 weeks weather downtime, the average CTV transits to and from Mostyn per annum is 8,400.

Applicant response: ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation* to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM. Additional information on Welsh Channel vessel movements added in Section 9.9 of the NRA and section 9.7.4 of the ES chapter and considered in impact assessment

- (4) Additional transits in excess of 200 per annum may also be made by Jack Up and general cargo vessels. The exclusion of these transits to Mostyn has resulted in a gross understatement of the overall number of vessel transits. Consequently, the risks and importance of the Welsh Channel to the Port of Mostyn and the local offshore windfarm sector has not been adequately assessed.

Applicant response: Additional information on Welsh Channel vessel movements added in Section 9.9 of the NRA and section 9.7.4 of the ES chapter and considered in impact assessment to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

- (5) The burial depth of the existing gas pipeline is -9m Chart Datum, will the Applicant please confirm that this level will be maintained following cable burial and placing of any cable protection materials.

Applicant response: The gas pipeline is buried to an average depth of 1.1m to Top of Pipe (TOP) (ref: 2018-021, Liverpool Bay Pipeline System Acoustic Inspection and Depth of Burial Vol 2- Offshore Pipelines Acoustic Inspection Survey Results Report Bibby HydroMap).

New cables are designed to be buried to 3.0m Top of Cable (TOC) from the seabed. Cables are partly routed in parallel to existing pipelines with sufficient clearance to achieve target burial depth.

This has been clarified in section 2.2 of the NRA

Figure 7.4. Ports and Harbours

- (1) For clarity, we advise that The Port of Mostyn does not lie within the Dee Conservancy, it is a separate Statutory Harbour Authority and its jurisdiction does not extend out to the Welsh Channel. Confusion may have arisen because Mostyn is also the Competent Harbour Authority for Pilotage where its jurisdiction extends from the weir at Chester through the Welsh Channel seawards to the Middle Patch Buoy off Prestatyn.

Applicant response: This has been updated in section 7.4 of NRA to provide this clarity.

9.7.5. – Future Baseline Scenario

- (1) The future scenario presented in the document omits to mention plans by The Port of Mostyn to expand its port infrastructure for future generation offshore windfarm projects. Construction of additional port infrastructure is expected during years 2025 and 2026 which coincides with the Hynet project construction. It will be essential for the Applicant to assess the risks and impacts the increase in Mostyn's shipping activities may have on their proposed cable works in the Welsh Channel at the time.

Applicant response: This has been added to future baseline section (9.7.5) and considered in cumulative assessment (section 9.12) to provide greater clarity on this point.

Additionally, we anticipate that there would be a condition placed upon our marine licence requiring a Vessel Management Plan to be submitted to PoM and NRW for prior approval.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

9.8.1. Maximum Design Scenario

- (1) Document ID 1025HOBSDG84141 shows two different cable route proposals where one directly across the Welsh Channel with the other being routed along the centre of the channel for approximately 700m before turning North towards the Douglas site. Will the Applicant please confirm which of the two cable routes is to be followed and provide the programme for the trenching, cable laying, burial operations and installation of any cable protection measures.

Applicant response: Confirmation of exact cable routing will be confirmed with the Cable Lay Contractor at contract award. However, after initial discussions with potential contractors, the second option (running 700 metres along the Channel) is the preferred solution.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

- (2) During the Teams consultation Mostyn was advised that the anticipated time to carry out the entire cable laying works was expected to be "up to 2 months" and that crossing the Welsh Channel would be completed "in a matter of hours". It's expected the Applicant will undertake geotechnical analysis in the vicinity of the cable landfall site however it may be helpful for them to be aware that when the adjacent South Hoyle Channel was initially dredged in 2001 the seabed sediment consisted of stiff clay overlain by 1m – 2m of sand. Removal of the clay required a barge mounted excavator supported by two dump barges to transport the arisings 15nm to licensed disposal Site Y. If similar soil conditions are present off the Point of Ayr

conventional trenching methods may not be suitable thus extending the time required for cable laying in the Welsh Channel.

Applicant response: Thank you for the provided Information. Potential contractors are aware of the stiff clay layer and the currently proposed burial methods, cable trencher and plough, are considered capable of dealing with the ground conditions for the required cable burial depth. We currently do not anticipate the need to carry out dredging for offsite disposal.

A detailed construction programme will be developed in collaboration with PoM once the Cable Lay Contractor is appointed. Permission from the Port of Mostyn will be gained prior to marine works in the channel commencing. The Cable Lay Contractor and ENI will endeavour to minimise the time the channel is obstructed.

- (3) In view of the 500m advisory safe passing distance, will the Applicant please provide an estimate of the number and type of vessels expected to be operating at any one time during the cable laying and burial operations in the Welsh Channel and provide an assessment of the total area required to maintain the safe passing distance.

Applicant response: Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities. Further detail on installation activities in the Welsh Channel added to section 2.3 of the NRA. Development of construction programme to be agreed with PoM added as embedded mitigation (Section 13 of NRA and 9.10 or ES chapter)

- (4) During cable laying operations, subject to water depth, it is usual for the cable to stream from the stern of the cable laying vessel for a considerable distance. Will the Applicant please advise if the cable streaming distance from the vessel has been included in the 500m safe passing distance.

Applicant response: The '500m safe zone' is considered from vessel itself and it is covering free span and catenary of cable. However, due to shallow water, catenary of cable to touch down point is short, and it is expected to be around 50m or less (to be confirmed by analysis in a later stage of the project). Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

- (5) Throughout the Application the proposed "target burial depth" of the cable is variously quoted as 3m or 2-3m and that it will be laid along the route of the existing gas pipeline, which is at a burial depth of minus 9m C.D where it crosses the Welsh Channel. Will the Applicant please confirm that the Hynet cable will also be laid to the same depth.

Applicant response: Target burial depth of cables crossing Welsh Channel, West Hoyle Spit and Beach crossings is 3.0metre Top of Cable (TOC) below the seabed. For the Main cable route (outside of the above-mentioned zones) burial depth is 2.0m TOC. (Ref. 1025H0BSRV84107 OFFSHORE POWER CABLE PROTECTION REQUIREMENT).

- (6) The application states that there will be external rock protection to a height of 0.8m at locations where new cables cross existing cables. Will the Applicant please clarify if it is their intention to

protect the cables crossing the Welsh Channel, and confirm that the installed cable level, including protection material, won't result in a loss of more than 5% of existing water depth as required under MGN 654.

Applicant response: There will be no external cable protection within the Welsh Channel. This has been clarified in Section 2.2.1 of the NRA. The use of external rock berm ("rock dumping") and concrete mattresses are to ensure protection of existing and new assets at cable crossings only. These crossing locations (drawings and co-ordinates) and details of their design were presented in the Marine Licence application. As per *1025DSBSCZ84173 OFFSHORE CABLES PRELIMINARY CROSSING DESIGN REPORT*, concrete mattresses are used to ensure required separation/protection of existing assets and rock cover to ensure stability of the crossing itself. There are no foreseen crossings in the Welsh Channel, and hence no additional seabed protection is specified.

It should be noted that 5% "loss of existing water depth" requirements cannot be respected for all crossing locations. Crossing of Burbo Bank Wind Farm Cable is at 5m WD (LAT) and North Hoyle Wind Farm is at 7m LAT. Typical mattress height of 0.3m, and rock berm height of 0.8m already exceeds allowable 5% loss of water depth. Please see details in the Marine Licence application form and attachments for Activity 02: Cable crossings. This has been added to section 9.11.7 of the ES chapter and included a "detailed draught assessment to be agreed with the MCA" as embedded mitigation (Section 9.10).

9.12.4.1 - Reduced Access to Local Ports

- (1) As set out in 9 above, the current and future number of vessel transits in the Welsh Channel has been significantly understated. There are circa 240 people employed in the O&M of the three offshore windfarms based at Mostyn. Any disruption to channel access would therefore have a significantly adverse impact on the operational efficiency and commercial viability of these windfarms. Consequently, Mostyn disagrees with the Applicant's assessment that the Severity of Consequence for the Mostyn based windfarm operations would be **minor**, and considers that the Severity of Consequence for the port's business and tenants would be **Severe**.

Applicant response: It is acknowledged that any closure and obstruction of the Welsh Channel during project marine works would have a significant impact on port operations. This has been updated in Section 9.11.4 of the ES chapter. However it is emphasised that the assessment is focussed on safety risks to shipping and navigation as opposed to commercial risks, to reflect this.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

- (2) Given that the number of vessels and transits of the Mostyn channel is significantly understated it follows that the assessment of the Frequency of Occurrence has been similarly understated. Statistically, the greater number of vessels in an area the higher the risk of Frequency of Occurrence; we therefore do not agree that the Frequency of Occurrence will be **Remote**.

Applicant response: Thank you for the provided Information. This has been updated in the baseline and impact assessment of the chapter and NRA to incorporate the details of the vessel types and

movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Additionally, Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

- (3) Similarly to 2) above, when the correct number of vessels is applied, we do not agree that "overall the Significance of Effect will be broadly acceptable" We also do not agree that this would be **Not Significant** in EIA terms. The correct (higher) vessel numbers will carry a corresponding higher risk of vessel collision, higher risk of vessel-on-vessel incidents potentially resulting in oil spillages and increased risk to the marine environment.

Applicant response: Thank you for the provided Information. The rankings have been updated however it is noted that the focus of the NRA is on safety risks and not commercial impacts. Therefore the overall significance is 'not significant' with the mitigation that cable installation plans within the Welsh Channel will be agreed with the Port

Additionally, Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

9.12.7. – Vessel Grounding Due to Reduced Under Keel Clearance

- (1) There are typically 12 CTV's operating from Mostyn on a daily basis each having 2 crew members and 12 turbine technicians on board. We therefore do not agree with the assessment's conclusions that, given the number of people involved and the risk of personal injury and loss of life, that the Severity of Consequence would be **Moderate**, nor that the Frequency of Occurrence would be **Remote**. Mostyn considers that the Significance of Effect (in EIA terms) of a grounding incident of these aluminium hulled vessels should be ranked higher than **Not Significant**.

Applicant response: Thank you for the provided Information. The number of vessel movements has been updated in Section 9.7.4 of the chapter. Due to the limited areas where reduced under keel clearance is expected and the small draughts of these CTVs, the rankings are considered to be appropriate to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Additionally, Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

9.16 – Conclusions

- (1) For the following reasons Mostyn does not agree with the Conclusion that “there will be no significant effects arising from the project’s construction, operations and maintenance or decommissioning phases”
- (a) Use of erroneous vessel data to inform the assessments of current vessel activity; **(Added in Section 9.9 of the NRA).**
 - (b) Incorrect assumptions on the level and type of vessels currently using the Welsh Channel; **(Added in Section 9.9 of the NRA).**
 - (c) Lack of awareness and consideration for the future scenario following Mostyn’s expansion plans and their impact during both the construction and operational phases of the Hynet project; **(Added in Section 9.10 of the NRA).**
 - (d) The questionable low ranking of the level of risk to shipping activities in the Welsh Channel; **(Rankings have been reviewed in the NRA)**
 - (e) Vagueness of the proposed burial depth of the cables and finished level for protection material; **(Info added in Section 2.2.1 of the NRA).**
 - (f) Lack of detailed information on the cable route at the Welsh Channel crossing points; **(Further installation details added in Section 2.2 of the NRA)**
 - (g) The assumed level of adverse operational and commercial impact on Mostyn and port users during the construction phase. **(The NRA and assessment is focussed on safety risks rather than operational or commercial)**
 - (h) No evidence an assessment has been carried out on the impact the Hynet construction works may have on the O & M bases at Mostyn which serve three Nationally Significant Infrastructure Projects. **(As above, however additional mitigation that construction works in the Welsh Channel need to be agreed with the Port of Mostyn should reduce the risks)**

Applicant response: Thank you for the provided Information. Further details on Welsh Channel movements provided in Section 9.9 of the NRA and section 9.7.4 of the ES chapter to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Additionally, Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port’s ongoing activities.

The lack of clarity and detail noted above has raised Mostyn’s concerns about the actual nature and extent the impacts the Hynet project will have on its business and that of its users. **Mostyn therefore advises that it will submit a Holding Objection pending the foregoing concerns being satisfactorily addressed.**

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APPENDIX L – NAVIGATIONAL RISK ASSESSMENT TECHNICAL REPORT

2.3 Installation Activities - Table 2.4

For context, it would be helpful if the Applicant would confirm the number and type of vessels that will be engaged in the Douglas - Point of Ayr cable laying operations where it crosses the Welsh Channel.

Applicant response: Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities. Further details added in Section 2.3. Construction plan to be agreed with PoM added as embedded mitigation (Section 13).

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The Douglas – Point of Ayr cable route is to bisect the Gwynt-y-Mor windfarm. An average of 8 CTVs operates from Mostyn to this windfarm using the Welsh Channel on a daily basis. We understand there have been discussions between RWE and Hynet on a proposed cable crossing agreement however pre-application consultations about the impacts of the proposed marine operations have not taken place. It is also understood that the North Hoyle and Rhyl Flats windfarms (also operated by RWE with four CTVs based at Mostyn) have not been invited to participate in a pre-application consultation meeting with the Hynet project team.

Applicant response: The Applicant will commit to develop an Operational Interface Management to implement all the communications and deliverables during the Execution phase. The planned IMOPS are part of the Execution phase and would involve directly the Wind Farm Operator.

7.2 – Subsea Cables and Pipelines

As noted in Section 2, several of the existing pipelines are to be “repurposed”. Will the Applicant please advise if they include the existing pipeline crossing the Welsh Channel. If it does, will they please detail the extent of the work and the time it will require.

Applicant response: The 20” pipeline (PL1030) crossing the Welsh Channel will be repurposed to transport CO₂ for the CCS Project, instead of natural gas. This comprises flushing, cleaning, and drying of the inside of the pipeline.

There will be no external modifications to the pipeline along its length within the Welsh Channel. Modification of the pipeline will be restricted to the ends of the pipeline inside the Gas Terminal at the Point of Ayr facility, and adjacent to the offshore new Douglas platform.

Figure 7.4

- (1) The Welsh Channel is stated to be 500m wide which is incorrect; for clarity, the dredged channel is 85m. wide, it is the channel boundary that is 500m. wide.

Applicant response: Thank you for the provided Information. This has been updated in Section 7.4 of the NRA to incorporate the correct details provided in this consultation response from PoM.

- (2) The imposition of a 500m safe passing distance and the presence of multiple vessels will have a serious impact on access to Mostyn. Will the Applicant please confirm how many vessels will be engaged in and around the channel area at any one time and assess the level of impact from multiple 500m safe passing distances.

Applicant response: A detailed construction programme, including vessel movements and operations, will be provided once the Cable Lay Contractor is engaged. The agreement of the finalised construction programme has been added as embedded mitigation (Section 13) and will be agreed with the PoM prior to any works in the Welsh Channel

Vessel Traffic Movements

Figure 9.6: AIS Tracks of Windfarm Vessels

- (1) For clarity, it seems a number of CTV's vessel transits are not being recorded in the AIS data. The rationale for using Unique Vessel method of calculation is understood however there are in fact 12 CTV's permanently based at Mostyn, each vessel making at least 2 transits per day through the Welsh Channel. The correct average number of CTV transits is therefore in the order of 8,400 per annum; adverse weather days are generally offset by additional vessel transits in the summer months.

Applicant response: Thank you for the provided Information. Additional information on Welsh Channel vessel movements added in Section 9.9 and considered in impact assessment (Section 10) to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

- (2) Transits to Mostyn by non-CTV's including jack-up vessels can vary greatly from month to month, year to year. Whereas the rationale for applying the Unique Vessel Count system is understood, it is questionable if this method is appropriate for an area where multiple daily transits per vessel are made. With particular regard to the Welsh Channel cable crossing area, we suggest that individual transit counts would provide a clearer picture of vessel movements and levels of risk.

Applicant response: Thank you for the provided Information. Additional information on Welsh Channel vessel movements added in Section 9.9 and considered in impact assessment (Section 10) to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

9.9 Future Baseline

- (1) The consultation document omits to mention that a Marine Works Application by Mostyn for a port extension project is due to be determined by summer 2024. This circa £100m project for new berths with an alongside water depth of -12m C.D. is for the assembly and deployment of future generation floating offshore windfarms. The increase in port infrastructure will result in a corresponding increase in transits of deep drafted vessels through the Welsh Channel, including towage of floating turbine platforms subject by RAM. The Risk Register should be reviewed to take account of these additional transits.

Applicant response: Thank you for the provided Information. This information has been added to Section 9.10 and considered in cumulative impacts (Section 11) to incorporate the details of the

vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Eni will also update its project Risk Register to incorporate these new vessel types and movement in the future.

- (2) The Applicant should be aware that subject to a favourable determination, construction of Mostyn's extension works is planned to take place during 2025 and 2026 coinciding with construction of the Hynet project.

Applicant response: Thank you for the provided Information. This has been considered in the cumulative impacts (Section 11). Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Eni will also update its project Risk Register to incorporate these new vessel types and movement in the future.

- (3) The Applicant should also be aware that Mostyn's development project will include the re-dredging of the Mostyn Inner Navigational Channel. The dredge arisings will be deposited in the licensed Disposal Site IS102 that extends from Point of Ayr to Mostyn Deep and includes the Wild Roads anchorage. We suggest that vessel traffic in this area should be included in the Risk Register.

Applicant response: Thank you for the provided Information. Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Eni will also update its project Risk Register (This has been noted in Section 9.10) to incorporate these new vessel types and movement in the future.

- (4) In addition to the Awel-y-Mor and Mona windfarm developments, the Applicant may also need consider that during the operational period two tidal range projects are planned for North Wales. One will be located immediately downstream of the Mostyn breakwater, the second to be located along the coast between Llandudno and Prestatyn. A third tidal range project is planned for the River Mersey.

Applicant response: Thank you for the provided Information. Eni will also update its project Risk Register to incorporate these new vessel types and movement in the future. These projects have been added to section 9.10 and considered in the cumulative section.

- (5) In view of these major project proposals and the corresponding increases in shipping activity in Liverpool Bay and off the Welsh coast during the next decade, it is suggested that the Applicants review their future vessel traffic assessment accordingly.

Applicant response: Thank you for the provided Information. Future baseline section (Section 9.10) has been updated with this information, which has been considered in the cumulative impacts

(Section 11) to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

10.2.4 Reduced Access to Local Ports

10.2.4.1 Construction Phase

- (1) The consultation with Mostyn was by Teams when only a very broad outline of the project was provided, no details of the cable laying work in the Welsh Channel were given. The scant information provided at the time didn't enable Mostyn to make informed comments, the Applicant's representative's contention that "no issues were raised" by Mostyn during the consultation is therefore inaccurate.

Applicant response: Thank you for the provided Information. Additional information on Welsh Channel vessel movements added in Section 9.9 and considered in impact assessment (Section 10) to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Additionally, Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

Severity of Consequence

- (1) During the Teams consultation meeting the Applicants stated that cable laying in the Welsh Channel area would be completed "in a couple of hours". The application states that there will be two cables crossing at a minimum separation of 30m. and potentially detouring along the Welsh Channel before passing through the West and East Hoyle Spits. This is a significant departure from the outline description provided during the consultation and raises serious concerns about the extent of channel area that will actually be impacted during the cable laying works.

Applicant response: All project marine work will be undertaken with prior arrangement and agreement with the port authorities.

The project will now require only one cable to be installed across the Welsh Channel.

The Marine Licence application and Environmental Statement (ES) presented two cable route options to negotiate the West Hoyle Spit.

The worst-case option presented within the ES, was a route that crossed the West Hoyle Spit following a parallel alignment to the existing Point of Ayr (PoA) to Douglas platform natural gas pipeline (PL1030), as shown in the ES at Figure 3.16. This option would require the excavation of trench across the West Hoyle Spit to facilitate passage of the cable lay vessel.

An alternative route further to the east, via a tidal channel through the spit, was also presented in the ES at Figure 3.17.

The Applicant can confirm that the worst-case route option, across the West Hoyle Spit, will no longer be pursued. The alternative option to the east is now the preferred option and will be taken forward to detailed design by our EPC contractor. The preferred option avoids the excavation of the trench across the spit.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay. The cable lay operation is key component of the project, providing electrical power (33kV) to the new Douglas platform.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Additionally, we anticipate that there would be a condition placed upon our marine licence requiring a Vessel Management Plan to be submitted to PoM and NRW for prior approval. Construction plan and VMP to be approved by PoM added as embedded mitigation (Section 13).

- (2) The Application states that “the spatial extent of construction areas where vessels may be required to deviate around vessels which are RAM “is expected to be small at any given time”. Will the Applicant please illustrate how a vessel (possibly of 170m LOA and 8m-11m draft) will be able to safely deviate around a cable laying vessel streaming a cable in a 150m wide channel, whilst also maintaining a 500m safe passing distance.

Applicant response: Vessel traffic management is part of extensive risk analysis and development of MOPO (Matrix of permissible operations). Considering cable lay vessel limited operational time in Channel and operational requirements will pre-arranged with PoM and agreement reached.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay. The cable lay operation is key component of the project, providing electrical power to the new Douglas platform.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Additionally, we anticipate that there would be a condition placed upon our marine licence requiring a Vessel Management Plan to be submitted to PoM and NRW for prior approval. Construction plan and VMP to be approved by PoM added as embedded mitigation (Section 13).

- (3) Will the Applicants please clarify how they propose to manage a situation whereby multiple vessels, each with its own 500m safe passing distance, are working in the same location at the same time? Further, will the Applicants please advise what measures they will put in place to manage a situation over a low/mid tide period when sea room will be restricted.

Applicant response: Vessel traffic management is part of extensive risk analysis and development of MOPO (Matrix of permissible operations). Considering cable lay vessel limited operational time in the Welsh Channel, and operational requirements, will be pre-arranged with PoM and agreement reached.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay. The cable lay operation is key component of the project, providing electrical power to the new Douglas platform.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Additionally, we anticipate that there would be a condition placed upon our marine licence requiring a Vessel Management Plan to be submitted to PoM and NRW for prior approval. Also worth noting here that there will only be one CLV working in the channel.

- (4) Mostyn's further concern is that in the event of a vessel-on-vessel collision resulting in a blockage of the channel, CTVs would be unable to access their berths at Mostyn thereby resulting in prolonged onboard detention of their crews and passengers. It should be noted that the CTVs are Day Boats with limited facilities and provisions on board. Mostyn therefore does not agree with the Applicant's assessment of the Severity of Consequence being ranked as minor.

Applicant response: ENI will update the *NRA section 10.2* and the *ES Chapter 9: Shipping and Navigation* to incorporate the details of the risks associated with the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Once the cable installation contractor has been appointed, detailed risk assessments will be undertaken prior to marine operations commencing and incorporated into marine methodologies, and mitigation measures will be put in-place.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay. The cable lay operation is key component of the project, providing electrical power to the new Douglas platform.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

- (5) The stated average number of 6 vessels per day accessing the Port of Mostyn based on AIS data is incorrect. There are 12 CTV's permanently based at Mostyn, each vessel makes a daily return passage consequently the risk of collision between vessels operating in a confined area will be correspondingly higher than stated.

Applicant response: Additional information on Welsh Channel vessel movements added in *ES Chapter 9: Shipping and Navigation sections 9.9 and 10* to incorporate the details of the of the risks associated with the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

- (6) Chart No. ID 1025HOBSDG84141 shows an option for the cable route to cross the Welsh Channel off Point of Ayr. The route entails laying the cable from the Point of Ayr eastwards for circa 750m along the channel before turning northwards between the West Hoyle Spit and the East Hoyle

Spit and making a second turn towards the Douglas platform. This option is significantly different to the direct crossing of the channel indicated by the Applicant at the pre-application Teams meeting. Mostyn is therefore concerned about this proposal for the following reasons:

- (a) The indirect crossing of the channel would require a much longer time for cable laying, burying and potential protection cover installation than the alternative option of a direct crossing that would be significantly less obstructive. **(Further clarification on timings for works in the Channel provided in Section 2.3. Construction plan and VMP to be approved by PoM added as embedded mitigation (Section 13))**
- (b) It would result in longer periods when navigation access to Mostyn would be obstructed. **(Further clarification on timings for works in the Channel provided in Section 2.3. Construction plan and VMP to be approved by PoM added as embedded mitigation (Section 13))**
- (c) The consequences for the Port of Mostyn's business and that of its users would be severe. **(These points have been considered however it is noted that the NRA is focussed on safety risks, rather than commercial impacts)**
- d) As a Statutory Harbour Authority and Pilotage Authority, Mostyn has statutory duties to maintain a safe open navigational access to the port. **(These points have been considered however it is noted that the NRA is focussed on safety risks, rather than commercial impacts)**
- e) Whereas the indirect cable route avoids cables being laid through the West Hoyle Spit which may be less expensive for the Hynet project, the indirect route, if pursued, would have significant adverse consequences for Mostyn and its clients. **(These points have been considered however it is noted that the NRA is focussed on safety risks, rather than commercial impacts)**
- f) Two cables are to be laid 30m apart across the Welsh Channel; it is unclear if they are to be laid in a single operation or on two separate occasions which would double the time required for cable laying and the period of obstructed navigational access. **(Clarified that there is only one cable)**
- g) It is unclear if the streaming distance from the cable laying vessel is included in the safe passing distance, if it has not, will the Applicant please reassess the proposed safe passing distance assumptions.
- h) In view of the uncertainties and foregoing concerns, Mostyn does not agree with the Applicant's assessment that the Severity of Consequence of restricting access to Mostyn during the construction phase would be minor. Mostyn's view is that they should be ranked as Serious.

Applicant response: ENI will update the Navigational Risk Assessment (NRA) and the assessment presented to incorporate the points raised above in **ES Chapter 9: Shipping and Navigation** in sections 2.3 and 13 noting that the ranking was reviewed in terms of safety risks and not in commercial impacts.

It should be noted that the project will, however, now require only one cable to be installed across the Welsh Channel, and this will be instead routed further to the east round the West Hoyle Spit, via a tidal channel, as shown in the ES at Figure 3.17.

The Marine Licence application and Environmental Statement (ES) presented two cable route options to enable two cables to negotiate the West Hoyle Spit.

The worst-case option presented within the ES, was a route that crossed the West Hoyle Spit following a parallel alignment to the existing Point of Ayr (PoA) to Douglas platform natural gas pipeline (PL1030), as shown in the ES at Figure 3.16. This option would require the excavation of trench across the West Hoyle Spit to facilitate passage of the cable lay vessel.

An alternative route further to the east, via a tidal channel through the spit, was also presented in the ES at Figure 3.17.

The Applicant can confirm that the worst-case route option, across the West Hoyle Spit, will no longer be pursued. The alternative option to the east is now the preferred option and will be taken forward to detailed design by our EPC contractor. The preferred option avoids the excavation of the trench across the spit.

A contributing factor in the consideration of the route options, was that only a few vessels in world have the capability of beaching and/or operating at a low draft. It was also found that none of them have capacity to perform laying across West Hoyle Spit while maintaining an Under Keel Clearance (UKC) with 3,000 tonnes of cable load on deck.

The ENI project team is committed to minimising any impact during the cable lay operation for the Hynet CCS project in Liverpool Bay.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach to cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Additionally, we anticipate that there would be a condition placed upon our marine licence requiring a Vessel Management Plan to be submitted to PoM and NRW for prior approval.

10.2.7. Vessel Grounding Due to Reduced Under Keel Clearance

10.2.7.1

- (1) It is noted that the cable route will follow the line of the existing gas pipeline where it crosses the Welsh Channel; the seabed level in this area is circa -6.7m Chart Datum (Admiralty Chart 1953). The burial depth of the Hynet cable is variously referred to within the Application as between 2m – 3m. and also refers to a “Target Depth”. Will the Applicant please clarify how the “Target Depth” relates to the “2m - 3m. depth”.

Applicant response:

Applicant response: Target burial depth of cables crossing Welsh Chanel, West Hoyle Spit and Beach crossings is 3 metres Top of Cable (TOC) below the seabed. For the Main cable route (outside of the above-mentioned zones) burial depth is 2.0m TOC. (Ref. *1025H0BSRV84107 OFFSHORE POWER CABLE PROTECTION REQUIREMENT*). The cable burial risk assessment has identified that the cable must be buried to a depth that will allow necessary (maintenance) dredging activities in future. The specified burial depth is 3 metres below the seabed, as per the existing gas export pipeline PL1030, and will provide the clearances required.

11.2 Cumulative Impacts Assessment

11.2.1 Vessel Displacement Leading to Increased Vessel-to-Vessel Collision Risk.

11.2.1.1 Construction Phase

- (1) As noted in several places above, the size and types of vessels and the number of annual transits to and from Mostyn has been significantly underestimated therefore the Cumulative Impacts and their risk rankings during all stages of the Hynet project relating to the Welsh Channel should be re-assessed.

Applicant response: Thank you for the provided Information. ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation in sections 9.10 and 11* to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Eni will also update its project Risk Register to incorporate these new vessel types and movement in the future.

11.2.4. Reduced Access to Local Ports

11.2.4.1 – Construction Phase

- (1) For the reasons set out above, Mostyn does not agree that the Severity of Consequence and the Frequency of Occurrence will respectively be “minor” and “remote” during each phase of the Hynet project. Mostyn has particular concerns about the channel being obstructed during the construction phase when vessels are operating in a macro-tidal channel with a corresponding higher risk of vessel-on-vessel collisions.

Applicant response:

Applicant response: Thank you for the provided Information. ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation* to review the ranking and incorporate these details that were omitted from the submitted assessments and have been provided in this consultation response from PoM. Eni will also update its project Risk Register to incorporate these details.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port’s ongoing activities.

Severity of Consequence

- (1) The Assessment contends that the presence of cable laying vessels in the Welsh Channel **may** result in some disruption to vessels accessing Mostyn, however it is indisputable that their presence **will** result in the Welsh Channel being obstructed. Further, the Applicant has failed to recognise that inbound and outbound vessels deep drafted need to transit the channel over High Water tidal windows. These vessels include jack-ups engaged in the offshore windfarm construction projects which often operate “back-to-back” i.e. one in – one out over the same H.W. period. If the channel is obstructed by the cable pull operations the delay to an OFW project would be extremely serious in terms of construction programme and costs therefore

Mostyn does not accept the Applicant's conclusion that the Severity of Consequence would be "minor".

Applicant response: Thank you for the provided Information. ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation* to incorporate the details of the vessel types and movements at PoM that were omitted from the submitted assessments and have been provided in this consultation response from PoM.

Eni will also update its project Risk Register to incorporate these vessel types and movements in the future.

- (2) The Assessment advises that the total cable laying operation will last "for up to two months" and that "works in the Welsh Channel lasting for a small proportion of this period". Will the Applicant please define what "a small proportion" means in terms of the potential to obstruct vessel access to Port of Mostyn.

Applicant response: A detailed construction programme will be developed in collaboration with PoM once the Cable Lay Contractor is appointed. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Eni will continue to meet with PoM to discuss the details of the planned activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval.

12.2.4.2

It is obvious that any obstructed access to a port will have serious consequences for both the port and its users. Mostyn therefore requests that any cable maintenance works in the Welsh Channel area should be subject to a License Condition that requires the Hynet to consult and agree the extent and period of the proposed works with Mostyn prior to commencement.

Applicant response: Eni agrees with the points raised by PoM.

A detailed construction programme will be developed in collaboration with PoM once the Cable Lay Contractor is appointed. The intention is that once a contractor has been appointed detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port's ongoing activities.

Eni will continue to meet with PoM to discuss the details of the planned activities.

We also anticipate that there would be a condition placed upon our marine licences requiring this to be done, and that a Vessel Management Plan will be submitted to PoM and NRW for prior approval. This has been added in the embedded mitigation section 13 of the NRA

Frequency of Occurrence

- (1) The statement that an average of 6 vessels per day accessed Mostyn is a gross understatement, the correct number is circa 12-14 vessels per day therefore the risk assessment should be reviewed accordingly.
- (2) The fact that an obstruction of the Welsh Channel will be localised is irrelevant, irrespective of the location of the obstruction, a blockage of the 1.5nm long channel will have serious implications for Mostyn and its shipping clients.
- (3) Will the Applicant please advise if it is anticipated that the cable laying operations at Point of Ayr will be carried out in one continuous operation during which the 500m safe passing zone will apply. If that is being planned, can they also please confirm the length of time when the cable laying vessel(s) will be operating within 500m either side of the Welsh Channel?

Applicant response: It is acknowledged that any closure and obstruction of the Welsh Channel during project marine works would have a significant impact on port operations. ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation* to reflect this in section 9.9 and considered in the impact assessment in section 10.

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM.

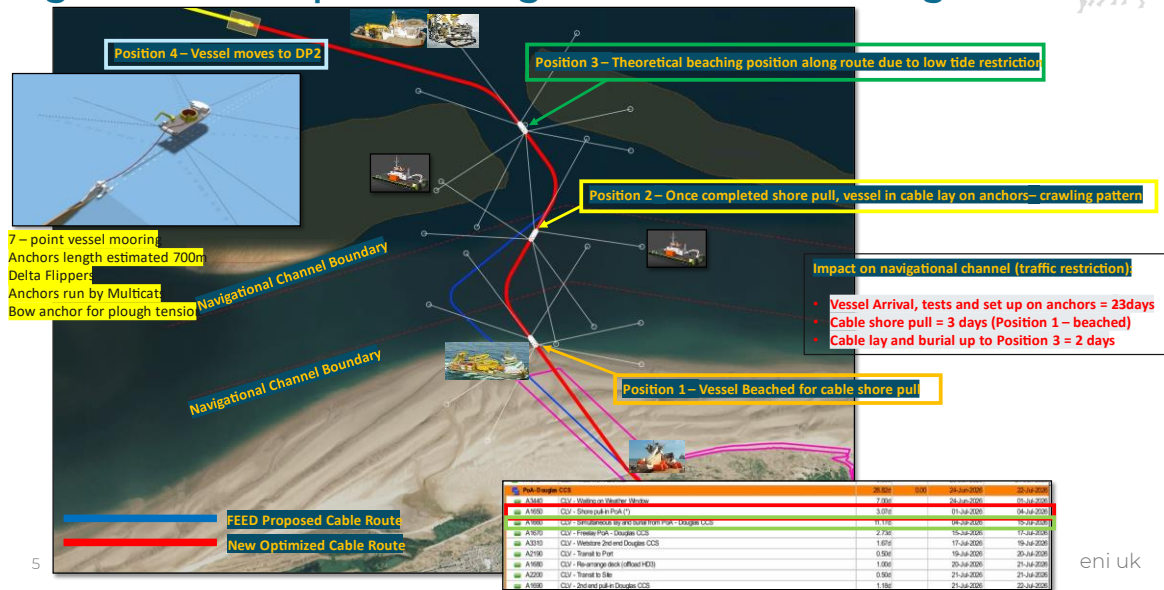
The current potential proposals for crossing the Welsh Channel are illustrated **Figure 1** below. The figure shows that there will be a seven (7) anchor spread around the CLV. Three to port, three to starboard, and a single cable off the bow. The bow cable will pull the vessel and the trailing plough to simultaneously lay and bury the cable. The cables to port and starboard will keep the vessel stable and prevent lateral movement thereby protecting the cable during the laying and burial process. This information has been added to section 2

There will be a 500m zone around the CLV within which movement by other vessels will be temporarily restricted via collaboration with the vessel captain and the port authority. The cable anchors will be marked by buoys and the repositioning of the anchors will be re-positioned out by three (3) shallow water multi-cats as shown in the Figure.

For the simultaneous lay and burial of the cable shown in the **Figure 1**, the CLV will traverse the Welsh Channel, pulled on anchors, over a period of approximately 12h-24 hours including potential weather standby.

Permission from the Port of Mostyn will be gained prior to marine works in the channel commencing. The Cable Lay Contractor and ENI will endeavour to minimise the time the channel is obstructed.

Figure 1: Anchor pattern for grounded and crawling CLV



Significance of the Effect

- (1) As explained above, Mostyn considers that the cumulative effect will not be “broadly acceptable” adverse significance as claimed. Mostyn is a 24/7/365 operational port and whereas unpredictable events are an inevitability, controllable events such as cable laying and repair events that obstruct the channel will have significant impacts.
- (2) The lack of clarity about the works and their potentially adverse impact on the operational capability and business of Mostyn as set out in Chapter 9 and Appendix L are causes for serious concern. **Mostyn therefore advises that it will submit a Holding Objection pending the foregoing matters being satisfactorily addressed.**

Applicant response: It is understood that any closure and obstruction of the Welsh Channel during project marine works would have a significant impact on port operations. ENI will update the Navigational Risk Assessment (NRA) and the assessment presented in *ES Chapter 9: Shipping and Navigation* to reflect this on safety risks, noting that the risk ranking has been reviewed .

Eni will continue to meet with PoM to discuss the details of the planned activities. The intention is that once a contractor has been appointed, detailed discussions will be held with PoM to agree an approach and programme for cable installation that would be acceptable to PoM and with the aim to have minimal impact on the port’s ongoing activities.

However, we are confident that an equitable solution can be found for all the concerns raised by PoM in this response to consultation.