

MONA OFFSHORE WIND PROJECT

Mona and Maritime and Coastguard Agency SoCG

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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MONA OFFSHORE WIND PROJECT

Contents

1 INITIAL STATEMENT OF COMMON GROUND BETWEEN MONA OFFSHORE WIND PROJECT AND THE MARITIME AND COASTGUARD AGENCY 1

1.1 Introduction 1

 1.1.1 Overview 1

 1.1.2 Mona Offshore Wind Project Elements under MCA’s Remit..... 1

 1.1.3 Overview of Mona Offshore Wind Project 1

 1.1.4 Approach to SoCG 2

1.2 Summary of SoCG..... 2

 1.2.1 Overview 2

 1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed 2

1.3 Summary of consultation 3

1.4 Agreement log 6

 1.4.1 Overview 6

 1.4.2 Shipping and navigation 7

1.5 References 13

Tables

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties. ... 3

Table 1.2: Summary of pre-application consultation with the MCA. 3

Table 1.3: Summary of post-application consultation with the MCA. 5

Table 1.4: Position definitions and colour coding. 6

Table 1.5: Agreement Log between the parties on shipping and navigation. 7

MONA OFFSHORE WIND PROJECT

Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
ALARP	As Low As Reasonably Practicable
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IALA	International Association of Lighthouse Authorities
IWRAP	IALA Waterway Risk Assessment Program
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

Units

Unit	Description
kV	Kilovolts

1 Initial Statement of Common Ground between Mona Offshore Wind Project and the Maritime and Coastguard Agency

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Initial Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and the Maritime and Coastguard Agency (MCA), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and the MCA is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination and submitted at the Deadlines indicated in the Rule 6 letter.

1.1.2 Mona Offshore Wind Project Elements under MCA’s Remit

1.1.2.1 The MCA provide a 24-hour maritime and coastal search and rescue emergency co-ordination and response service for the United Kingdom. The MCA also produces legislation and guidance and provides certification to ships and seafarers. The elements of the Mona Offshore Wind Project which may affect the interests of the MCA are Work Numbers 1 to 4, covering the intertidal, seaward of Mean High Water Springs (MHWS), and offshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) and Schedule 14 (Marine Licence) of the Draft DCO F03 (PDA-003).

1.1.2.2 This SoCG covers the following topics of relevance to the MCA, seaward of MHWS:

- Shipping and navigation.

1.1.3 Overview of Mona Offshore Wind Project

1.1.3.1 Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- **Mona Array Area:** This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located
- **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located

MONA OFFSHORE WIND PROJECT

- Intertidal access areas: The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
- Landfall: This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
- Mona Onshore Development Area: The area in which the landfall, Mona Onshore Cable Corridor, Mona Onshore Substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the connection to National Grid infrastructure will be located
- Mona Onshore Substation: This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- Mona 400 kV Grid Connection Cable Corridor: The corridor from the Mona Onshore Substation to the National Grid substation.

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by the MCA within its response to Scoping, Section 42 consultation and as raised through the Marine Navigation Engagement Forum (MNEF), stakeholder meetings and hazard workshops that have underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by the MCA during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement Log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG has outlined the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

MONA OFFSHORE WIND PROJECT

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Shipping and navigation	Ongoing point of discussion

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with the MCA, relevant to shipping and navigation during the pre-application phases of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with the MCA, relevant to shipping and navigation during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with the MCA.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
14/10/2021	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> Project introduction and proposed approach Data collection strategy (incl. survey timings).
10/11/2021	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> Project introduction and proposed approach Site selection in relation to shipping and navigation constraints Impacts of COVID-19 on data collection Impacts to ferry operators (Safety and Commercial) Relation of impacts on ferry routes with regulation and guidance Sensitivity of ferry operator schedules.
01/02/2022	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> Update on proposed approach for assessment Status of National Policy Statement updates Requirement for cumulative assessment Adverse ship routeing assessment Consenting of Walney Extension and assessment of gap with the North East Potential Development Area Modelling to reflect local navigational conditions.
14/02/2022	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> Relation of impacts on ferry routes with regulation and guidance Site selection in relation to shipping and navigation constraints Impacts to ferry operators (Safety and Commercial) Need for a cumulative assessment Adverse weather routeing decision making Need for collaborative engagement in assessment.

MONA OFFSHORE WIND PROJECT

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
06/05/2022	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> • Project update • Cumulative impacts of multiple projects on ferry operations • How the cumulative impacts will be assessed or examined • Impacts of three Irish Sea projects on Isle of Man economy/society • Extent of incident data • Safety of navigating in gaps • Consequences of allisions with wind turbines.
30/05/2022	Scoping opinion	Statutory	<ul style="list-style-type: none"> • Assessment approach MGN654 compliance • Impacts on vessel routeing and adverse weather routeing • Cumulative impacts to be assessed • Wind turbine layouts to comply with MGN654 • Export cable corridor marking and protection.
23-25/08/2022	Navigation Simulations	Non-statutory	<ul style="list-style-type: none"> • Full Bridge Navigation Simulations with Stena Line masters, with MCA in attendance, to assess safety of navigation for existing routes and deviated routes for the Preliminary Environmental Impact Report (PEIR).
10/10/2022	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> • Project update • Application process • Approach to cumulative assessment • Introduction to Morgan/Morecambe combined transmission project.
10/10/2022 / 11/10/2022	Hazard Workshop	Non-statutory	<ul style="list-style-type: none"> • Cumulative Hazard Workshop of the Mona Potential Array Area to inform the PEIR.
18/01/2023	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> • Project update on boundary amendments and how commitments will be tested post PEIR.
23/05/2023 – 25/05/2023	Navigation Simulations	Non-statutory	<ul style="list-style-type: none"> • Full Bridge Navigation Simulations with Stena Line masters, with MCA in attendance, to assess safety of navigation for existing routes and deviated routes.
31/05/2023	S42 response	Statutory	<ul style="list-style-type: none"> • Concern over loss of safe navigable sea space that would increase collision risk.
21/09/2023	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> • Project update and review of boundary changes.
28/09/2023/ 29/09/2023	Hazard Workshop	Non-statutory	<ul style="list-style-type: none"> • Cumulative Navigation Risk Assessment (NRA) hazard workshop undertaken to inform the Environmental Statement.

MONA OFFSHORE WIND PROJECT

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19/12/2023	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> • Review of engagements and assessments to date • Review of findings of shipping and navigation assessments • Cumulative impacts associated with Moir Vannin Offshore Wind Farm Scoping Boundary.

Table 1.3: Summary of post-application consultation with the MCA.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
12 July 2024	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> • Review of structure of SoCG • Review of Agreement Log.
31 July 2024	Consultation meeting	Non-statutory	<ul style="list-style-type: none"> • Review of structure of SoCG • Review of Agreement Log.

MONA OFFSHORE WIND PROJECT

1.4 Agreement log

1.4.1 Overview

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

1.4.1.2 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2) in relation to shipping and navigation.

MONA OFFSHORE WIND PROJECT

1.4.2 Shipping and navigation

Table 1.5: Agreement Log between the parties on shipping and navigation.

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
Environmental Impact Assessment (EIA)				
MCA.SAN.1	Policy and planning	The assessment has identified all appropriate plans, policies and guidance relevant to shipping and navigation and has given due regard to them within the assessment.	Agreed	Agreed
MCA.SAN.2	Consultation	The MCA have been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
MCA.SAN.3	Surveys	The vessel traffic surveys were conducted in accordance with Marine Guidance Note (MGN) 654 (MCA, 2021), and therefore suitable for assessment.	Agreed	Agreed
MCA.SAN.4	Baseline environment	Sufficient primary and secondary shipping and navigation data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
MCA.SAN.5	Assessment methodology	The Formal Safety Assessment approach to the assessment of effects is deemed appropriate for the purposes of predicting potential effects on shipping and navigation receptors.	Agreed	Agreed
MCA.SAN.6		The assessment within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) and Volume 2, Chapter 7: Shipping and navigation (APP-059) has been undertaken in line with relevant shipping and navigation legislation and guidance including being compliant with MGN654 requirements.	Agreed	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
MCA.SAN.7		The quantitative risk modelling methods (e.g. International Association of Lighthouse Authorities (IALA) Waterway Risk Assessment Program (IWRAP) and encounter modelling) used to assess collision and allision risk are appropriate.	Agreed	Agreed
MCA.SAN.8		The navigation simulations were appropriate for informing Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed	Agreed
MCA.SAN.9		The Hazard Workshop was undertaken allowing adequate stakeholder input into the risk assessment and are reflected within the NRA conclusions laid out in Section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed	Agreed
MCA.SAN.10		All relevant cumulative projects have been identified and are included within the shipping and navigation assessment	Agreed	Agreed
MCA.SAN.11		The assessment of effects has been undertaken based on an appropriate maximum design scenario for shipping and navigation.	MCA have assumed a maximum build out of Work No. 1, assuming the largest number of wind turbines and OSPs	Agreed
MCA.SAN.12	Assessment of the effects from the project alone	All hazards and impacts identified as relevant to the Mona Offshore Wind Project have been assessed within the shipping and navigation assessment.	Agreed	Agreed
MCA.SAN.13		The potential effects identified within the chapter represent a comprehensive list of potential effects on shipping and navigation from the Mona Offshore Wind Project.	Agreed	Agreed
MCA.SAN.14		All navigational safety hazards have been assessed as either Broadly Acceptable or Tolerable (if As Low As Reasonably Practicable (ALARP)) and there are no unacceptable navigational safety hazards.	Agreed	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
MCA.SAN.15		The mitigation measures described within Table 1.10 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures marked in grey colour and 'not adopted' in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be unnecessary or disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	Agreed	Agreed
MCA.SAN.16		The Mona Offshore Wind Project would not interfere with the use of recognised sea lanes (NPS EN-3, paragraph 2.8.326-7) essential to international navigation.	Agreed	Agreed
MCA.SAN.17		The Mona Offshore Wind Project could have potential significant effects on lifeline ferry services between Liverpool and Douglas.	Agreed	Agreed
MCA.SAN.18		The impact assessment conclusions for search and rescue and emergency response are consistent with MGN654 subject to the agreement of post-consent plans with the MCA.	Ongoing point of discussion subject to preparation of Written Representation	Ongoing point of discussion
MCA.SAN.19		All other impacts (impacts on radar, communications and positioning systems, etc.) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
MCA.SAN.20	Assessment of the effects from the project cumulatively excluding Moir Vannin Offshore	All hazards and impacts relevant to the Mona Offshore Wind Project in combination with cumulative projects (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
MCA.SAN.21	Wind Farm Scoping Boundary	All navigational safety hazards relating to the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed as either Broadly Acceptable or Tolerable (if ALARP) and there are no unacceptable navigational safety hazards.	Agreed	Agreed
MCA.SAN.22		The mitigation measures described within Table 1.10 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures identified marked in grey colour and 'not adopted' in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be unnecessary or disproportionate and therefore all medium risk hazards relating to the cumulative scenario (excluding Mooir Vannin Scoping Boundary) can be considered ALARP without the need for additional risk control measures.	Agreed	Agreed
MCA.SAN.23		The Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes (NPS EN-3, paragraph 2.8.326-7) essential to international navigation.	Agreed	Agreed
MCA.SAN.24		The Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant effects on lifeline ferry services between Liverpool and Douglas, Heysham and Douglas, Heysham and Belfast, and Liverpool and Belfast.	Agreed	Agreed
MCA.SAN.25		The impact assessment conclusions for search and rescue and emergency response are consistent with MGN654 subject to the agreement of post-consent plans with the MCA.	Ongoing point of discussion subject to preparation of Written Representation	Ongoing point of discussion

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
MCA.SAN.26		All other impacts (radar, communications and positioning systems, etc.) assessed for the cumulative scenario (excluding Moir Vannin Scoping Boundary) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
MCA.SAN.27	Assessment of the effects from the project cumulatively including Moir Vannin Offshore Wind Farm Scoping Boundary	All hazards and impacts relevant to the Mona Offshore Wind Project in combination with cumulative projects (including Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed	Agreed
MCA.SAN.28		Allision and collision risk hazards between the Morgan Array Area and Moir Vannin Scoping Boundary are unacceptable based on the findings of the Cumulative Regional Navigational Risk Assessment Appendix D (APP-098).	Agreed	Agreed
MCA.SAN.29		The Mona Offshore Wind Project in combination with cumulative projects (including Moir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes (NPS EN-3, paragraph 2.8.326-7) essential to international navigation.	Agreed	Agreed
MCA.SAN.30		The Mona Offshore Wind Project in combination with cumulative projects (including Moir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant effects on lifeline ferry services between Liverpool and Douglas, Heysham and Douglas, Heysham and Belfast, and Liverpool and Belfast.	Agreed	Agreed
MCA.SAN.31		The impact assessment conclusions for search and rescue and emergency response are consistent with MGN654 subject to the agreement of post-consent plans with the MCA.	Ongoing point of discussion subject to preparation of Written Representation	Ongoing point of discussion

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	MCA Position	Status
MCA.SAN.32		All other impacts (impacts on radar, communications and positioning systems, etc.) assessed for the cumulative scenario (including Moir Vannin Offshore Wind Farm Scoping Boundary) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
Draft DCO				
MCA.SAN.33	Mitigation/management measures	The wording of conditions relevant to navigational safety within Schedule 14 of C1 Draft Development Consent Order F03 (PDA-003) are appropriate and adequate.	Ongoing point of discussion subject to preparation of Written Representation and any updates to the draft DCO	Ongoing point of discussion

1.5 References

MCA (2021). MGN654. Available: <https://www.gov.uk/guidance/offshore-renewable-energyinstallations-impact-on-shipping>. Accessed June 2024.