

MONA OFFSHORE WIND PROJECT

Mona and Trinity House SoCG

Deadline: 1

Application Reference: EN010137

Document Reference: S_D1_17

Document Number: MOCNS-J3303-RPS-10267

August 2024

F01



Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D1	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	Aug 2024

Prepared by:

RPS/Nash Maritime Ltd

Prepared for:

Mona Offshore Wind Ltd.

Signatories

Signed	
Name	
Date	
Position	
For	Trinity House
Signed	
Name	
Date	
Position	
For	Mona Offshore Wind Limited

MONA OFFSHORE WIND PROJECT

Contents

1 INITIAL STATEMENT OF COMMON GROUND BETWEEN MONA OFFSHORE WIND PROJECT AND TRINITY HOUSE 1

1.1 Introduction 1

 1.1.1 Overview 1

 1.1.2 Mona Offshore Wind Project Elements under Trinity House’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 Trinity House. 3

Table 1.3: Summary of post-application consultation with Trinity House..... 4

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
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 Trinity House

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 Trinity House, 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 Trinity House 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 Trinity House’s Remit

1.1.2.1 The Corporation of Trinity House of Deptford Strond, also known as Trinity House, is the official authority for lighthouses and aids to navigation in England, Wales, the Channel Islands and Gibraltar. The elements of the Mona Offshore Wind Project which may affect the interests of Trinity House are Work Numbers 1 to 4, covering the intertidal, seaward of Mean High Water Springs (MHWS), 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 Trinity House, 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 Trinity House 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 Trinity House 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 outlines 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 Trinity House, 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 Trinity House, 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 Trinity House.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
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.
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.

MONA OFFSHORE WIND PROJECT

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
23/05/2022	Scoping opinion	Statutory	<ul style="list-style-type: none"> Assessment approach MGN654 compliance Cumulative impacts to be assessed Additional and impacts to existing Aids to Navigation Decommissioning Plan Export cable corridor marking and protection.
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 Preliminary Environmental Information Report (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.
02/06/2023	S42 response	Statutory	<ul style="list-style-type: none"> Requirements for marking, lighting and notification.
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.
18/12/2023	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. Review of Mona Offshore Wind Project mitigation measures. Cumulative impacts associated with Mooir Vannin Offshore Wind Farm Scoping Boundary.
08/02/2024	MNEF meeting	Non-statutory	<ul style="list-style-type: none"> Project update Summary of work undertaken since last MNEF Update to Cumulative NRA DCO process.

Table 1.3: Summary of post-application consultation with Trinity House.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
08/07/2024	Meeting	Non-statutory	Meeting to discuss the initial SoCG

MONA OFFSHORE WIND PROJECT

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation

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	Trinity House Position	Status
Environmental Impact Assessment (EIA)				
TH.SAN.1	Policy and planning	The assessment has identified all appropriate plans and policies relevant to shipping and navigation and has given due regard to them within the assessment.	Agreed. Source: Meeting 08/07/24.	Agreed
TH.SAN.2	Consultation	Trinity House have been adequately consulted on shipping and navigation matters to date.	Agreed. Source: Meeting 08/07/24.	Agreed
TH.SAN.3	Surveys	The vessel traffic surveys were conducted in accordance with Marine Guidance Note (MGN) 654 (MCA, 2021), and therefore suitable for assessment.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.4	Baseline environment	Sufficient primary and secondary data has been collated to appropriately characterise the baseline environment.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.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. Source: Meeting 08/07/24.	Agreed
TH.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.	Agreed. Source: Meeting 08/07/24.	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	Trinity House Position	Status
TH.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 and align with relevant guidance.	Agreed. Source: Meeting 08/07/24.	Agreed
TH.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 Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed. Source: Meeting 08/07/24.	Agreed
TH.SAN.10		Relevant cumulative projects have been identified and are included within the shipping and navigation assessment	Agreed. Source: Meeting 08/07/24.	Agreed
TH.SAN.11		The assessment of effects has been undertaken based on an appropriate maximum design scenario for shipping and navigation.	Agreed. Source: Meeting 08/07/24.	Agreed
TH.SAN.12		Assessment of the effects from the project alone	Hazards and impacts identified as relevant to the Mona Offshore Wind Project have been assessed within the shipping and navigation assessment.	Agreed. Source: Meeting 08/07/24.
TH.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. Source: Meeting 08/07/24.	Agreed
TH.SAN.14		All identified hazards have been assessed as either Broadly Acceptable or Tolerable (if As Low As Reasonably Practicable (ALARP)) and there are no unacceptable hazards.	Agreed. Source: Meeting 08/07/24.	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	Trinity House Position	Status
TH.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 identified (but not adopted) in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	Trinity House are in the process of reviewing their position. Further engagement between the parties on this matter is planned	Ongoing point of discussion
TH.SAN.16		The Mona Offshore Wind Project would not interfere with the use of recognised sea lanes essential to international navigation.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.17		The Mona Offshore Wind Project could have potential significant effects on lifeline ferry services between Liverpool and Douglas. Impacts on other ferry services and strategic routes are minor and not considered to have significant operational impacts.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.18		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) would not be significant in EIA terms with proposed mitigation measures in place.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.19	Assessment of the effects from the project cumulatively excluding Moir Vannin Offshore Wind Farm Scoping Boundary	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. Source: Meeting 08/07/24.	Agreed
TH.SAN.20		All identified hazards relating to the cumulative scenario (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed as either Broadly Acceptable or Tolerable (if ALARP) and there are no unacceptable hazards.	Agreed. Source: Meeting 08/07/24.	Agreed

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	Trinity House Position	Status
TH.SAN.21		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 (but not adopted) in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) can be considered ALARP without the need for additional risk control measures.	Trinity House are in the process of reviewing their position. Further engagement between the parties on this matter is planned	Ongoing point of discussion
TH.SAN.22		The Mona Offshore Wind Project in combination with cumulative projects (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes essential to international navigation.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.23		The Mona Offshore Wind Project in combination with cumulative projects (excluding 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. Impacts on other ferry services and strategic routes are minor and not considered to have significant operational impacts.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.24		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) would not be significant in EIA terms with proposed mitigation measures in place.	Defer to MCA. Source: Meeting 08/07/24.	n/a

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	Trinity House Position	Status
TH.SAN.25	Assessment of the effects from the project cumulatively including Moir Vannin Offshore Wind Farm Scoping Boundary	Hazards and impacts identified as 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. Source: Meeting 08/07/24.	Agreed
TH.SAN.26		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 (but not adopted) in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (including Moir Vannin Offshore Wind Farm Scoping Boundary) can be considered ALARP without the need for additional risk control measures.	Trinity House are in the process of reviewing their position. Further engagement between the parties on this matter is planned	Ongoing point of discussion
TH.SAN.27		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 essential to international navigation.	Defer to MCA. Source: Meeting 08/07/24.	n/a
TH.SAN.28		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. Impacts on other ferry services and strategic routes are minor and not considered to have significant operational impacts.	Defer to MCA. Source: Meeting 08/07/24.	n/a

MONA OFFSHORE WIND PROJECT

Reference Number	Discussion point	Applicant's Position	Trinity House Position	Status
TH.SAN.29		All other impacts (impacts on search and rescue, 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.	Defer to MCA. Source: Meeting 08/07/24.	n/a
Draft DCO				
TH.SAN.30	Mitigation / management measures	The wording of conditions relevant to navigational safety within Schedule 14 of Draft Development Consent Order F03 (PDA-003) are appropriate and adequate.		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.