

MONA OFFSHORE WIND PROJECT

Mona and the Defence Infrastructure Organisation SoCG F02

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Image of an offshore wind farm

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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
ATC	Air Traffic Control
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
DIO	Defence Infrastructure Organisation
EIA	Environmental Impact Assessment
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OSP	Offshore Substation Platform
RAF	Royal Air Force
SoCG	Statement of Common Ground

Units

Unit	Description
kV	Kilovolts

1 Initial Statement of Common Ground between Mona Offshore Wind Project and the Defence Infrastructure Organisation

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and the Defence Infrastructure Organisation (DIO), 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 DIO is set out in section 1 of Appendix F of the Rule 6 letter that was 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 DIO’s remit

1.1.2.1 DIO represents the Ministry of Defence as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. The elements of the Mona Offshore Wind Project which may affect the interests of DIO are within Work Number 1, covering offshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (C1 Draft Development Consent Order F04).

1.1.2.2 This SoCG covers the following topics of relevance to DIO:

- Aviation and radar.

1.1.3 Overview of the Mona Offshore Wind Project

1.1.3.1 The 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 Mean High Water Springs (MHWS), in which the offshore export cables will be located and in which the intertidal access areas are located

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- 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 infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV 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 initial 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 DIO within its response to Scoping, Section 42 consultation and as raised through the Engagement Forum that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by DIO 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 30 September 2024 (Deadline 3).

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.

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

Topic	Agreed
Aviation and radar	Ongoing point of discussion

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicant with DIO 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 DIO during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with DIO.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> Response included within Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
09 May 2023	S42	Statutory	<ul style="list-style-type: none"> Requested further details on the Mona Offshore Wind Project, including co-ordinates and grid references Raised concerns relating to the overlap of the Mona Array Area with a highly surveyed area.

Table 1.3: Summary of post-application consultation with DIO.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
03 April 2024	Relevant representation	Statutory	<ul style="list-style-type: none"> Provision of DIO's relevant representation, principally concerned with the potential impact of the Mona Offshore Wind Project on the radar systems sited at Warton Aerodrome and at RAF Valley.
06 June 2024	Online meeting	Non-statutory	<ul style="list-style-type: none"> Recapped engagement with DIO so far, namely: <ul style="list-style-type: none"> DIO undertook an initial assessment of the Mona Offshore Wind Project at PEIR and submitted a response to the statutory consultation (DIO reference: DIO10055489) noting that DIO did not anticipate the development having an operational impact on either Warton or Valley radars. However, DIO did raise a concern relating to the overlap of the Mona Array Area with a highly surveyed area Following PEIR, the Applicant revised the southern boundary of the Mona Array Area to avoid the highly surveyed area, reduced the overall area (km²) of the Mona Array Area and increased wind turbine rotor

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<p>diameter and maximum tip height. This was communicated to DIO in October 2023</p> <ul style="list-style-type: none"> – DIO undertook an assessment of the revised project and issued a response (DIO reference: DIO10055142) to confirm that potential impacts on the highly surveyed area was no longer a concern, but that the development proposed has the capacity to impact on the operation and capability of radar systems sited at Warton Aerodrome and at RAF Valley. Specifically, the development will be detectable by Air Traffic Control (ATC) Radar(s) deployed at RAF Valley and Warton Aerodrome. The impact of the turbines on the ATC radars at RAF Valley and Warton Aerodrome may need to be addressed through suitable technical mitigation solutions – Following acceptance of the Mona Offshore Wind Project by the Planning Inspectorate for examination, DIO submitted letter DIO10055142 as its relevant representation. • It was agreed during the meeting that DIO would undertake a further assessment with their stakeholders to determine the nature of the potential concern highlighted in their relevant representation.
24 June 2024	Letter	Non-statutory	<ul style="list-style-type: none"> • Set out the objection of DIO to the Mona Offshore Wind Project on the grounds of the unacceptable impact that the Mona Offshore Wind Project wind turbines would have on ATC Radar system sited at BAE Systems Warton. • Set out concerns that the development would introduce a physical obstruction to aviation. Identified that this specific concern might be addressed through the submission, approval, and implementation of an aviation lighting scheme and through the submission of sufficient data to ensure the development is accurately charted.
31 July 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Review of SoCG
Aug – Sep 2024	Email correspondence	Non-statutory	<ul style="list-style-type: none"> • Engagement on updating SoCG

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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).

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1.4.2 Aviation and radar

Table 1.5: Agreement Log between the parties on aviation and radar.

Reference Number	Discussion point	Applicant's Position	DIO's Position	Status
Environmental Impact Assessment (EIA)				
DIO.AR.1	Consultation	The Applicant has undertaken adequate consultation with DIO on potential impacts on aviation and radar.	Agreed	Agreed
DIO.AR.2	Consultation	The EIA has had due regard to matters raised by DIO through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed	Agreed
DIO.AR.3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within DIO's remit.	Agreed	Agreed
DIO.AR.4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar.	Agreed	Agreed
DIO.AR.5	Scoping	Agreement to the scoping of impacts for the EIA for aviation and radar	Agreed	Agreed
DIO.AR.6	Study area	The aviation and radar study area is appropriate for the receptors, sites and impacts assessed	Agreed	Agreed
DIO.AR.7	Project design envelope	Volume 4, Chapter 1: Aviation and radar (APP-079) has identified, described and assessed the maximum design scenario for the EIA	Agreed	Agreed
DIO.AR.8	Assessment methodology	The sensitivity of aviation and radar receptors has been correctly identified and sufficiently described within Volume 4, Chapter 1: Aviation and radar (APP-079)	Agreed	Agreed

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Reference Number	Discussion point	Applicant's Position	DIO's Position	Status
DIO.AR.9	Assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) with respect to DIO's remit in Volume 4, Chapter 1: Aviation and radar (APP-079) are appropriate	Agreed	Agreed
DIO.AR.10	Assessment of the effects from the project alone	The impact assessment initially predicted a potential effect on the primary surveillance radar (PSR) at Warton Aerodrome, as set out in Volume 4, Chapter 1: Aviation and radar (APP-075). However, due to DIO not raising a concern against effects on BAE Systems Warton Aerodrome in response to the statutory consultation on the PEIR, the Applicant did not undertake a detailed impact assessment for Warton Aerodrome in APP-075. Based on the latest position of DIO set out in their letter of 24 June 2024, the Applicant accepts the potential for significant effects on the PSR at Warton Aerodrome.	Agreed. The development proposed, when operational, would cause unacceptable and unmanageable interference to the effective operation of air traffic control radar deployed at BAE Systems Warton. It is the Applicant's responsibility to provide a suitable technical mitigation solution to DIO as set out in our written representation submitted at Deadline 1.	Agreed
DIO.AR.11	Assessment of the effects from the project alone	The development proposed has the potential to impact on aviation safety by introducing a physical obstruction to aircraft during the construction, operation and maintenance, and decommissioning phases. This impact is acknowledged in Volume 4, Chapter 1: Aviation and radar (APP-075).	Agreed, the applicant has acknowledged the potential impact on aviation safety due to the introduction of a physical obstacle.	Agreed

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Reference Number	Discussion point	Applicant's Position	DIO's Position	Status
DIO.AR.12	Assessment of the effects from the project cumulatively with other projects	The impact assessment initially predicted a potential effect on the primary surveillance radar (PSR) at Warton Aerodrome, as set out in Volume 4, Chapter 1: Aviation and radar (APP-075). However, due to DIO not raising a concern against effects on BAE Systems Warton Aerodrome in response to the statutory consultation on the PEIR, the Applicant did not undertake a detailed impact assessment for Warton Aerodrome in APP-075. Based on the latest position of DIO set out in their letter of 24 June 2024, the Applicant accepts the potential for significant effects on the PSR at Warton Aerodrome.	Agreed. The development proposed, when operational, would cause unacceptable and unmanageable interference to the effective operation of air traffic control radar deployed at BAE Systems Warton. It is the Applicant's responsibility to provide a suitable technical mitigation solution to DIO as set out in our written representation submitted at Deadline 1.	Agreed
DIO.AR.13	Mitigation	<p>The mitigation of [<i>description of mitigation solution</i>] agreed with BAE Systems and provided to DIO in relation to Warton Aerodrome are appropriate and will ensure significant effects are avoided.</p> <p><i>The parties are engaging on the nature of the mitigation required in the square brackets above. BAE Systems Warton Aerodrome are in the process of implementing a new primary surveillance radar at Warton Aerodrome which is expected to be online by the end of 2024 subject to site acceptance and flight trials. BAE Systems have indicated that mitigation is likely to include as a minimum; optimisation of the radar for Mona Offshore Wind Project, flight trials and a safety case to the Civil Aviation Authority. BAE Systems anticipate being in a position to provide further information by mid-October 2024. The parties will provide updates through subsequent SoCG at Deadline 3 and Deadline 5.</i></p>	<p>Agree with the Applicants position.</p> <p>Agreement over adequacy of mitigation is ongoing and subject to discussion as set out in the Applicants position</p>	Ongoing point of discussion

Development Consent Order (DCO)

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Reference Number	Discussion point	Applicant's Position	DIO's Position	Status
DIO.AR.13	Aviation Safety	Requirements 3, Aviation Safety, is appropriate.	<p>The applicant has proposed the wording of a requirement, set out at Schedule 2, Requirement 3 (1) of the draft Development Consent Order [REP2-004], which would require that an aviation safety lighting scheme is drafted with MOD (DIO Safeguarding) and that such an aviation safety lighting scheme is both implemented and retained for the life of the development. In the interest of ensuring aviation safety is maintained, a requirement detailing the submission, approval, and implementation of an aviation lighting scheme that would be applied during the construction phase should also be included.</p> <p>In addition, the applicant has proposed the wording of a requirement, set out at Schedule 2, Requirement 3 (2) of the draft Development Consent Order [REP2-004] which would necessitate the submission of sufficient data to ensure that the development is accurately charted.</p> <p>Assuming that the wording of Requirement 3 (parts (1) and (2)) is amended to reflect the suggested change above, and that there are no changes to the parameters of the development, the wording would be considered acceptable.</p>	<p>Ongoing point of discussion</p> <p>Deadline 3 update: The Applicant will engage with DIO on the changes requested to Requirement 3</p>

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Reference Number	Discussion point	Applicant's Position	DIO's Position	Status
DIO.AR.14	Warton Aerodrome Primary Surveillance Radar	The DCO requirement for Warton Aerodrome Primary Surveillance Radar is appropriate	At this time MOD cannot agree to the wording of a requirement relating to the Warton Aerodrome Primary Surveillance Radar. The current MOD objection must remain in place until such time as technical and operational assessments have been completed on a mitigation proposal submitted to the MOD (DIO Safeguarding) by the applicant, and that those assessments have confirmed that the mitigation is viable.	Ongoing point of discussion Deadline 3 update: The Applicant will engage with DIO on the drafting of the proposed DCO requirement for Warton Aerodrome Primary Surveillance Radar

1.5 Appendix 1

Proposed wording of DCO Requirement for 'Warton Aerodrome Primary Surveillance Radar'

X.—(1) No wind turbine generator forming part of the authorised development is permitted to rotate its rotor blades on its horizontal axis until the Secretary of State, having consulted with the Ministry of Defence and the Operator, confirms in writing that appropriate mitigation will be implemented and maintained for the life of the authorised development and that arrangements have been put in place with the Operator to ensure that such appropriate mitigation is implemented.

(2) For the purposes of this requirement—

“appropriate mitigation” means measures to prevent or remove any adverse impacts which the operation of the authorised development will have on the Operator’s ability to provide safe and efficient air traffic services for Warton Aerodrome during the life of the authorised development;

“approved mitigation” means the appropriate mitigation measures agreed with the Ministry of Defence and the Operator in accordance with sub-paragraph (1);

“Ministry of Defence” means as represented by Defence Infrastructure Organisation – Safeguarding, Kingston Road, Sutton Coldfield, B75 7RL or any successor body;

“Operator” means BAE Systems (Operations) Limited incorporated under the Companies Act (Company Number 01996687) whose registered office is Warwick House, PO Box 87, Farnborough Aerospace Centre, Farnborough, Hants, GU14 6YU or such other organisation as is licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services for Warton Aerodrome.

(3) The undertaker shall thereafter comply with all obligations contained within the approved mitigation for the life of the authorised development.