

MONA OFFSHORE WIND PROJECT

Response to Ørsted IPs D2 Submission

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

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Acronyms

Acronym	Description
BAE	British Aerospace
DCO	Development Consent Order
DIO	Defence Infrastructure Organisation
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
ExA	Examining Authority
EWG	Expert Working Group
JNCC	Joint Nature Conservation Committee
HRA	Habitat Regulations Assessment
MDS	Maximum Design Scenario
MNEF	Marine Navigation Engagement Forum
NPS	National Policy Statement
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
OSP	Offshore Substation Platform
PSR	Primary Surveillance Radar
SNCB	Statutory Nature Conservation Board
SoCG	Statement of Common Ground
SPA	Special Protected Area
TCE	The Crown Estate

Units

Unit	Description
km	Kilometres

1 Response to Ørsted IPs D2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Ørsted IPs Deadline 2 submission below.

2 Response To Ørsted IPs D2 Submission

2.1 Ørsted IPs

Table 2.1: REP2-104 – Ørsted IPs

Reference	Written Submission Comment	Applicant's response
REP2-104.1	<p>Introduction</p> <p>1.1 This response to comments on relevant representations is provided in accordance with Deadline 2 of the examination timetable for the application by Mona Offshore Wind Farm Limited (the "Applicant") for an Order under the Planning Act 2008 (the "Act") granting Development Consent for the Mona Offshore Wind Farm (the "Project").</p>	The Applicant notes the response and has responded to the detailed points below.
REP2-104.2	<p>1.2 We represent six owners of operational offshore windfarms in the East Irish Sea (as set out relevant representations RR-004, RR-007, RR-047, RR-087, RR-088 and RR-090), who we refer to together as the "Ørsted IPs" for the purposes of this document.</p>	
REP2-104.3	<p>1.3 In this document, we respond briefly to comments made by the Applicant (PDA-008) on the Ørsted IPs' relevant representations. We note that the general matters raised in these responses are also addressed in the Ørsted IPs' written representation (REP1-072), the summary of oral submissions on behalf of two of the Ørsted IPs (REP1-063) and were canvassed during ISH2. However, the Ørsted IPs consider it may be helpful to the Examining Authority to highlight some of the points where concerns have not been addressed and which therefore warrant specific response.</p>	
REP2-104.4	<p>1.4 The Ørsted IPs' responses to the Applicant's comments are structured by topic, which align with the issues raised in the relevant representations. We note that the Applicant provided separate (albeit almost identical) responses to each of the Ørsted IPs' relevant representations. The Ørsted IPs' responses in this document relate to comments which are repeated in each of the Applicant's responses (other</p>	

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	than for radar, which has only been raised by two of the Ørsted IPs).	
REP2-104.5	<p>2. Wildlife Impacts</p> <p>2.1 In response to the concerns raised in the Ørsted IPs' relevant representations, regarding the Applicant's assessment of wildlife effects, the Applicant stated (among other points): <i>"The Mona Offshore Wind Project has undertaken a robust assessment of all potential impacts on marine wildlife informed by appropriate data sources from site specific surveys and detailed desktop studies, in accordance with relevant topic specific guidance"</i>.</p>	<p>The Applicant notes the Ørsted IPs' comments and refers to Table 2.9 of the Response to Written Representations document submitted at Deadline 2 (REP2-078) for more detailed responses to the Ørsted IPs' separate points initially presented in their Written Representation.</p> <p>The Applicant has updated several of the relevant application documents (tracked and clean versions) at Deadline 2 to address errata identified in the Errata Sheet submitted at Deadline 1 (REP1-044) and any further discrepancies considered to be errata identified in Natural Resources Wales (NRW's) and the Joint Nature Conservation Committee's Written Representations (REP1-056; REP1-066/REP1-067, respectively).</p>
REP2-104.6	<p>2.2 The Ørsted IPs refer to the discrepancies identified in parts of the Applicant's assessment identified in the Ørsted IPs written representation (REP1-072). The Ørsted IPs reiterate their concerns regarding the adequacy of the Applicant's assessment, which require to be adequately addressed in the course of the Examination.</p>	<p>Several additional minor errata have been identified since submission of the updated application materials at Deadline 2. These have been recorded in the Errata Sheet (S_PD_1 F04) and an Offshore Ornithology Errata Clarification Note (S_D3_26) submitted at Deadline 3. None of the errata identified in the application materials alter the conclusions presented in Volume 2, Chapter 5: Offshore Ornithology (REP2-016) and the HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar Sites Assessments (REP2-010).</p> <p>The Applicant has also submitted an Offshore Ornithology Supporting Information Technical Note at Deadline 3 (S_D3_19), which is intended to provide further clarification on the offshore ornithology application approach and provision of additional information in accordance with the SNCBs advice. The Applicant has engaged with the JNCC and NRW on the scope and presentation of this supporting information technical note for offshore ornithology to ensure this sufficiently addresses the SNCBs' concerns and the Examining Authority's Request for Further Information – Rule 17 Letter (PD-012/PD-012a).</p> <p>A full list of updated documents can be found in the updated Application Guide submitted at Deadline 3 (A5 F06).</p> <p>Taking into consideration the updates outlined above, the Applicant considers both the environmental assessment and the HRA documentation to be robust, precautionary and reflective of the matters agreed via the Evidence Plan process with the relevant stakeholders.</p>

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REP2-104.7	<p>3. Shipping and Navigation</p> <p>3.1 In their relevant representations, the Ørsted IPs noted the effects of the Project on shipping and navigation, and sought to be involved in stakeholder engagement on this issue. In response, the Applicant stated (among other points):</p> <p><i>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the Marine Navigation Engagement Forum (MNEF) which includes Ørsted and other offshore wind energy developers.</i></p>	<p>As described within the Applicant's response to Ørsted IPs Written Representations at Deadline 2 (Section 2.9 of REP2-078), the Applicant considers that a comprehensive assessment of shipping and navigation impacts has been undertaken which has included input from both existing offshore wind developers in the eastern Irish Sea and operators familiar with navigating adjacent to existing offshore wind farms.</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) and the Mitigation and Monitoring Schedule (J10 F03) to continue the Marine Navigation Engagement Forum (MNEF), which includes Ørsted and other offshore wind energy developers, post-consent. The MNEF will be used to update stakeholders on the Mona Offshore Wind Project and also be used for engagement on shipping and navigation mitigations set out within Table 1.10 and Table 1.43 of the Navigational Risk Assessment (Volume 6, Annex 7.1: Navigational Risk Assessment APP-098). In particular, the MNEF will facilitate the development of the Vessel Traffic Management Plan (secured within the deemed Marine License within the draft DCO and in accordance with the Outline Vessel Traffic Management Plan APP-200) to safely manage Mona Offshore Wind Project construction and operations and maintenance activities and reduce adverse impacts on other marine users, which would include other offshore wind farm operators.</p>
REP2-104.8	<p>3.2 The Ørsted IPs acknowledge this statement, and note that, in their view, additional engagement is required beyond what has occurred through the Marine Navigation Engagement Forum to date. As stated in the Ørsted IPs' written representation, they consider ongoing updates regarding consultation with vessel operators, engagement on any mitigations which could influence their developments and a mechanism for consultation on any operational procedures for the Project relating to construction and operation traffic to/from the Ørsted IPs developments, is required.</p>	
REP2-104.9	<p>4. Energy Yield</p> <p>4.1 In their relevant representations, the Ørsted IPs raised concerns regarding the impacts of the Project on the energy yield of their developments. In response, the Applicant explained that wake loss effects had been scoped out for further assessment, due to the distance of the Project from operational wind farms.</p>	<p>The Applicant notes the Ørsted IPs response regarding energy yield.</p> <p>As set out in para 1.5.11.6 of The Planning Statement (APP-186) the Applicant considers that it has adequately considered NPS (National Policy Statement) EN-3 paragraph 2.8.44 in selection of the Mona array area, with respect to other offshore wind farms. The Mona Offshore Wind Project location adheres to the TCE (The Crown Estate) Round 4 siting criteria, which requires a separation of at least 7.5 km to existing wind farms. As set out in para 10.5.2.10, and table 10.10 of Other Sea Users (APP-062), the closest operational wind farm to the Mona Array Area is 17.8 km, and the closest of the Ørsted IP projects is 30.6 km (with others of the Ørsted IP projects being significantly further away). Further to meeting TCEs spacing criterion, the Applicant, during the pre-application phase, has taken the steps required by the relevant NPS policy to further minimise potential impacts. The Mona Array Area was reduced following receipt of statutory pre-application consultation responses on the Preliminary Environmental Information Report</p>
REP2-104.10	<p>4.2 In support of this approach, the Applicant stated that: ...NPS EN-3 (paragraph 2.8.44) recognises that offshore wind development will occur in or close to areas where there is other offshore infrastructure" and referred to a study commissioned by TCE which "indicated that, or the non-site-specific scenarios modelled, potential wake effects level off with approximately 10 km separation between offshore wind</p>	

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	farms, and for separations much larger than 20 km wake effects become vanishingly small.	(PEIR), as described in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016).
REP2-104.11	4.3 The Ørsted IPs have set out their position on the requirement to assess this matter in their written representation. However, we wish to specifically respond to the Applicant's comments outlined above.	On the basis of the distances between the Mona Array Area and other operational wind farms the requirements of NPS EN-3 paragraph 2.8.197, regarding assessment of potential effects, are not considered to be engaged. A detailed response to The ExA's Q1.19.1 in S_D3_25 sets out the Applicant's position on the need for an assessment of potential wake effects.
REP2-104.12	4.4 The Ørsted IPs note that paragraph 2.8.44 of the NPS EN-3, relied on by the Applicant, states: "There may be constraints imposed on the siting or design of offshore wind farms because of the presence of other offshore infrastructure...". We consider this paragraph provides support for the proposition that the Project should properly assess its potential effects on other offshore wind farms, such that design and siting constraints can be considered adequately.	
REP2-104.13	4.5 The Ørsted IP also note that the NPS EN-3 requires that new offshore wind development assess the effects of development on existing infrastructure: ¹ <i>Where a potential offshore wind farm is proposed close to existing operational offshore infrastructure, or has the potential to affect activities for which a licence has been issued by government, the applicant should undertake an assessment of the potential effects of the proposed development on such existing or permitted infrastructure or activities</i>	
REP2-104.14	4.6 A proper interpretation of NPS EN-3 requires that the Applicant assess and consider its potential effects on the Ørsted IPs developments. It is not appropriate to 'scope out' wake loss at this stage, as it is a direct effect on another sea user not simply an effect to be considered through the EIA process.	
REP2-104.15	4.7 Additionally, the Ørsted IPs note that they do not consider the findings of the TCE-commissioned study referred to by the Applicant, 2 which was commissioned to "optimise the use of the seabed" rather than assess the	

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	potential effects of the Project on the Ørsted IPs developments, relieves it of its responsibility to assess the potential effects of the Project in the context of its specific environment.	
REP2-104.16	4.8 The Applicant has so far failed to address this point which the Ørsted IPs believe requires to be dealt with in early course in the Examination, to ensure successful co-existence of the Ørsted IPs and the Project	
REP2-104.17	5. Radar 5.1 This response is provided on behalf of Walney Extension Limited and Burbo Extension Limited (“the Extensions”) only	The Applicant notes the Ørsted IPs response.
REP2-104.18	5.2 In response to the Extensions’ relevant representations relating to mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar, the Applicant stated that: <i>The Mona Offshore Wind Project has not had a technical objection in regard to the Primary Surveillance Radar (PSR) from the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO), who is responsible for Warton Aerodrome aeronautical/aviation safeguarding. No significant impacts to Warton Airfield PSR were identified in EIA terms in Volume 4, Chapter 1: Aviation and radar (APP-075). Thus, the Applicant has no reason to believe that the Mona Offshore Wind Project might adversely affect or increase the cost of the mitigation put in place by Walney Extension Ltd related to Warton Aerodrome PSR.</i>	As set out in the Statement of Common Ground (SoCG) with The Defence Infrastructure Organisation (DIO) (REP2-089) submitted at Deadline 2, 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 (APP075). However, due to the DIO confirming that they did not anticipate that Mona Offshore Wind Project would have an operational impact on BAE (British Aerospace) Systems Warton Aerodrome in response to the statutory consultation on the preliminary environmental information report, the Applicant did not undertake a detailed impact assessment for Warton Aerodrome in APP-075. Based on the latest position of the DIO set out in their written representation (REP1-054), the Applicant accepts the potential for significant effects in the absence of mitigation on the PSR at Warton Aerodrome. The Applicant is engaging with BAE Systems Warton Aerodrome on the nature of the mitigation required to ensure potential significant effects are avoided. 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 Applicant will continue to engage with BAE Systems Warton
REP2-104.19	5.3 The Extensions note that the Ministry of Defence has now filed a written representation (REP1- 054) objecting to the Project, on the grounds that the Project would have unacceptable impacts on the air traffic control radar system sited at BAE Warton. This reinforces the Extensions’ concerns regarding the potential of the Project to impact on their mitigation arrangements.	

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REP2-104.20	5.4 The Extensions await the Applicant providing a satisfactory outcome to these impacts which if unresolved will cause an unacceptable impact on the Ministry of Defence, BAE, and the Extensions.	Aerodrome and the DIO and provide further updates at subsequent Examination deadlines.