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National Infrastructure Planning
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24 September 2024

Your ref: EN010137

Dear Sir/Madam

Application by Mona Offshore Wind Limited for an Order Granting Development Consent for the Mona Offshore Wind Farm.

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010

Examination Timetable – Deadline 3

Thank you for inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Examining Authority as part of its assessment of the proposed Mona offshore windfarm project. We would like to submit the following response to the first written questions (ExQ1) and comments on the updated draft DCO.

Written Questions (ExQ1)

Question and reference		MCA Response
<p>Q1.15.1 Safety of navigation and search and rescue Would you like to comment on the Applicant's response to your Written Representation, as set out in Table 2.6 of [REP2-078], particularly in respect of:</p>	<p><i>Amendments to DML Condition 18(1)(a) [REP2-004] in relation to layout principles and whether the two lines of orientation are sufficiently secured (ref REP1-068.4);</i></p>	<p>The layout principles contained in APP-050 F1.3 Environmental Statement - Volume 1, Chapter 3: Project Description are agreed and MCA is content the two lines of orientation is secured in the DML Condition 18(1)(a).</p>
	<p><i>Whether the reduction in search and rescue capability as a result of the presence of the offshore array has been fully mitigated (ref REP1-068.6);</i></p>	<p>DML Condition 22 secures the completion of a Search and Rescue (SAR) Checklist where mitigations specific to SAR will be discussed and agreed once the details are known, as per NPS EN-3 paragraph 2.8.185 and MGN654 paragraph 6.9.</p>
	<p><i>The requirement for radio surveys and whether amendments to the drafting of DML Condition 22 and/or any other DML Conditions are required to achieve this (ref REP1-068.7);</i></p>	<p>Radio reception surveys are of short duration and the need for them is captured in the SAR Checklist, therefore we are content to omit them from the DML.</p>
	<p><i>Securing provision of Automatic Identification System (AIS) and Very High Frequency (VHF) capability to the MCA with direct access to HM Coastguard systems (ref REP1-068.7);</i></p>	<p>MCA is content to discuss the need for to fit AIS receiver(s) and VHF aerial(s) during the post-consent stage, therefore we are content to omit them from the DML.</p>
	<p><i>Safety zones (ref REP1-068.14); and,</i></p>	<p>MCA is content with the Applicant's response that they intend to apply for 500m safety zones around infrastructure during major maintenance and that it will not include when Service Operation Vessels (SOV) are connected to a wind turbine generator.</p>
	<p><i>The rationale for 125m micro-siting of turbines and platforms and knock-on effects for achieving the 1,400m spacing (ref REP1-068.24).</i></p>	<p>MCA recognises that the likelihood of two turbines on opposite sides of a SAR lane micrositing 125m inwards is low, however it is still possible that a primary or secondary SAR lane width could be reduced by 250m. The final turbine layout plans are still to be discussed and such large potential variations in the micrositing may be of concern.</p>
<p>Q1.15.11 Cumulative allision and collision risk REP1-029 records agreement that "Allision and collision risk hazards</p>	<p><i>What are the implications of this finding in light of para 2.8.331 of NPS EN-3?</i></p>	<p>NPS EN-3 paragraph 2.8.331 states:</p> <p><i>There are statutory requirements concerning automatic establishment of navigational safety zones relating to offshore petroleum developments.</i></p>

<p><i>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)" (ref MCA-SAN.28). This reflects the conclusions of the ES, as recorded in [APP-059].</i></p>		<p>There are no oil and gas platforms between the boundaries of the Morgan and Moir Vannin offshore wind farms therefore there are no implications of 500m safety zones granted under the Petroleum Act 1987. This does not change the conclusion that navigational risks in this area are unacceptable.</p>
<p>Q1.15.12 Exceptions to the Critical National Priority presumption <i>The Planning Statement [APP-186] considers the exceptions to the CNP presumption set out in NPS EN-1 para 4.1.7 but concludes that "none of the above exceptions apply to the Mona Offshore Wind Project".</i></p>	<p><i>To the Applicant, for the avoidance of doubt:</i></p> <ul style="list-style-type: none"> <i>Is it your position that the likely significant effects on navigation and shipping from the project alone and cumulatively identified in [APP-059] (including cumulative collision and allision risk effects) would not present an unacceptable risk to, or interference with, human health and public safety? If so, provide further justification for this position.</i> <i>Is it your position that the likely significant effects on navigation and shipping from the project alone and cumulatively identified in [APP-059] (including cumulative collision and allision risk effects) would not present an unacceptable risk to, or unacceptable interference offshore to navigation? If so, provide further justification for this position.</i> <p><i>To the MCA:</i></p> <ul style="list-style-type: none"> <i>Do you wish to comment on these matters?</i> 	<p>MCA would like to comment on NPS EN-3 paragraph 2.8.321 which states that wind farms should not be consented if they pose unacceptable risks to navigation safety after mitigation measures have been adopted. MCA is content that the Mona offshore wind farm does not pose unacceptable risks to navigation after the risk controls secured in the NRA and DML have been adopted.</p> <p>MCA would also like to comment on NPS EN-3 paragraph 2.8.318 which states that wind farms should avoid or minimise disruption or economic loss to shipping companies in particular in the approaches to ports and strategic routes essential to regional, national and international trade, and lifeline ferries. As per our Written Representation at Deadline 1, there remains a concern that the in-combination effects of the Mona, Morgan, Morecambe and Moir Vannin offshore wind farms will have significant impacts to ferry operations in the Irish Sea and whether these services will remain commercially viable with the necessary deviations.</p>

Updated draft DCO

MCA requested two amendments to the draft DML conditions in Schedule 14 in our Written Representation submitted at Deadline 1:

- 13(12) regarding cable exposures – the applicant has agreed our suggested amendment and we are therefore content.
- 18(a)(ii) regarding micrositing – this remains an outstanding issue, as above.

Yours faithfully,



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UK Technical Services Navigation



Peter Lowson
Offshore Energy Lead
HM Coastguard Governance, Policy,
Standards and International