Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Maritime and Coastguard Agency ExQ1 Responses

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Image of an offshore wind farm

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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.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
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.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
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.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
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,

Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
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 Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the 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 Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables 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.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
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.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

Term	Meaning
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.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

Units

Unit	Description
GW	Gigawatt
km	Kilometres
km^2	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 Response to Maritime and Coastguard Agency EXQ1 Responses

1.1 Introduction

1.1.1.1 The Applicant has responded to the Maritime and Coastguard Agency's response to the Examining Authority's ExQ1 below.

2 Response to Maritime and Coastguard Agency ExQ1 Responses

Table 2.1: REP3-087 - Maritime and Coastguard Agency

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Maritime and Coastguard Agency response	Applicant's response
REP3-087.1	Maritime and Coastguard Agency (MCA)	Q1.15.1Safety 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: 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);	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).	The Applicant notes the MCA response. Subsequent to responses to ExQ1, the Applicant confirmed during Issue Specific Hearing 4 (Offshore Matters) that it will be reducing the Project's requirement for 'micro-siting' and 'tolerance' of 100 m and 25 m respectively to 50 m and 5 m respectively, as discussed against REP3-087.6 below.
REP3-087.2	Maritime and Coastguard Agency (MCA)	Q1.15.1 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);	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.	The Applicant notes the MCA response.
REP3-087.3	Maritime and Coastguard Agency (MCA)	Q1.15.1 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);	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	The Applicant notes the MCA response.
REP3-087.4	Maritime and Coastguard Agency (MCA)	Q1.15.1 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);	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.	The Applicant notes the MCA response.
REP3-087.5	Maritime and Coastguard Agency (MCA)	Q1.15.1 Safety zones (ref REP1-068.14); and	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.	The Applicant notes the MCA response.
REP3-087.6	Maritime and Coastguard Agency (MCA)	Q1.15.1 The rationale for 125m micro-siting of turbines and platforms and knock-on effects for achieving the 1,400m spacing (ref REP1-068.24).	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.	The Applicant confirmed during Issue Specific Hearing 4 (Offshore Matters) that it will be reducing the Project's requirement for 'micro-siting' and 'tolerance' of 100 m and 25 m respectively to 50 m and 5 m respectively. This has been secured through update to the draft Development Consent Order (C1 F05) submitted at Deadline 4.
REP3-087.7	The Applicant, MCA	Q1.15.11 Cumulative allision and collision risk REP1-029 records agreement that "Allision and collision risk hazards between the Morgan Array Area and Mooir 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]. What are the implications of this finding in light of para 2.8.331 of NPS EN-3?	NPS EN-3 paragraph 2.8.331 states: *There are statutory requirements concerning automatic establishment of navigational safety zones relating to offshore petroleum developments.* There are no oil and gas platforms between the boundaries of the Morgan and Mooir 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.	The Applicant notes the MCA response.
REP3-087.8	The Applicant, MCA	Q1.15.12 Exceptions to the Critical National Priority presumption 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".	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.	The Applicant notes that the 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. The Applicant has avoided or minimised disruption or economic loss to the shipping and navigation industries (NPS EN-3 paragraph 2.8.328) through the site selection process and changes

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Maritime and Coastguard Agency response	Applicant's response
		To the Applicant, for the avoidance of doubt: • 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. • 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. To the MCA: Do you wish to comment on these matters?	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 Mooir 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.	made to the Mona Array Area to address potential effects on shipping and navigation. The Navigation Risk Assessment (NRA) and Shipping and Navigation Chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Mona Offshore Wind Project and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to ferry services. Following the PEIR and responses to the S42 statutory consultation, the Mona Offshore Wind Project has modified the boundaries of the Mona Array Area which has increased the available searoom to improve navigational safety and has avoided or minimised the deviations to ferry routes (as set out in sections 7.9 and 7.11 of Volume 2, Chapter 7: Shipping and navigation (APP-059) and in section 4.11.2 of Volume 1, Chapter 4: Site selection and consideration of alternatives (APP-051)). The Applicant has worked together with the developers of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm who have also amended the boundaries of their respective projects to increase searoom and reduce the cumulative impacts on ferries and other vessels. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and an NRA hazard workshop (as described in Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) and Appendices F and I of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-043)). Some residual effects on operations resulting from route diversions remain for the project alone during adverse weather routing for the Isle of Man Steam Packet route between Liverpool and Douglas. The Applicant has judged this effect to be of moderate significance and therefore significant in EIA terms. It is demonstrated in Figure 1.32 of the NRA (APP-098) that these adverse weather tracks are spread across much of the study area and therefore it would not be possible to entirely avoid these effects for a project of this size in this location without some residual effects on these routes. Further cumulative moderate adverse effects on typical and adverse weather routeing are associated with impacts of adjacent Tier 1 and Tier 2 cumulative projects for which the Applicant is unable to mitigate. However, the Applicant is engaging with the Steam Packet Company and Stena Line on commercial agreements to mitigate the residual impact on operations.
REP3-087.9	-	-	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.	The Applicant notes that the MCA is content with the update made to Condition 13(12) in Schedule 14 of the draft Development Consent Order (C1 F05). As discussed above, the Applicant has updated Condition 18(1)(a)(iii) in Schedule 14 of the draft Development Consent Order (C1 F05) at Deadline 4 to reduce the combined micro-siting and installation tolerance allowance from up to 125 m to 55 m unless otherwise agreed with the licencing authority in consultation with the MCA and Trinity House.