Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Mona and Stena Line SoCG

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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).
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 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 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.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
ALARP	As low as reasonably practicable
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ETV	Emergency tow vehicle
ExA	Examining Authority
HAZID	Hazard identification
IMO	International Maritime Organisation
MCA	Maritime and Coastguard Authority
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
NPS	National Policy Statement
NRA	Navigational Risk Assessment
NSIP	Nationally Significant Infrastructure Project
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
RLB	Red line boundary

Acronym	Description
RoRo	Roll on Roll off
SoCG	Statement of Common Ground
UNCLOS	United Nations Convention on the Law of the Sea
VTMP	Vessel traffic management plan
WTG	Wind turbine generator
TSS	Traffic separation schemes

Units

Unit	Description
GHz	Gigahertz
kV	Kilovolt
m	Metre
nm	Nautical mile

1 Initial Statement of Common Ground between Mona Offshore Wind Project and Stena Line

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 Stena Line, 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 Examining Authority (ExA) has requested that a SoCG between the Applicant and Stena Line be submitted at into the Examination at Deadline 5 in Hearing Action Point 13 of the Action Points arising from Issue Specific Hearing 4 (Offshore Matters) (EV6-006).

1.1.1.3 This document is intended to provide the Examining Authority (ExA) 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 Stena Line's remit

1.1.2.1 Stena Line is one of the world's largest ferry operators with over 26,000 yearly sailings on routes across Scandinavia and the Baltic, Irish and North Seas. Stena Line operates six passenger and freight Roll on Roll off (RoRo) vessels in the Irish Sea on three separate routes. Stena Line's Liverpool to Belfast route to the west of the Isle of Man is the key route affected by the Mona Offshore Wind Project. The elements of the Mona Offshore Wind Project which may affect the interests of Stena Line are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) and Schedule 14 (Marine Licence) of the Draft Development Consent Order (C1 F06).

1.1.2.2 This SoCG covers the following topics of relevance to Stena Line:

- Shipping and Navigation

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

- 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 SoCG has been developed during the 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 Stena Line within its Section 42 consultation and as raised through the Marine Navigation Engagement Forum (MNEF) that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Stena Line 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 3 December 2024 (Deadline 5).

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.

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

Topic	Agreement status
Shipping and Navigation	Some points agreed, some ongoing points under 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 Stena Line 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 Stena Line during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with Stena Line.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Marine Navigation Engagement Forum (MNEF)			
10/11/2021	Meeting	Non-statutory	• 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.
06/05/2022	Meeting	Non-statutory	• Project update • Cumulative impacts of multiple projects on ferry operations • How the cumulative impacts will be assessed or examined • Impacts of projects on Isle of Man economy/society • Extent of incident data • Safety of navigating in gaps • Consequences of allisions with wind turbines.
10/10/2022	Meeting	Non-statutory	• Project update • Application process • Approach to cumulative assessment • Introduction to Morgan/Morecambe combined transmission project.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
18/01/2023	Meeting	Non-statutory	• Project update • Cumulative assessment approach and progress • Update on assessment work completed since MNEF 3 (10 October 2022) – HAZID workshop, PEIR deliverables Morgan NRA, cumulative regional NRA and bridge simulations • PEIR process and statutory consultation • Project revisions and commitments • Planned activities and next steps.
21/09/2023	Meeting	Non-statutory	• Project update • Cumulative assessment approach and progress • PEIR assessment and key findings • Project revisions • Update on assessment work undertaken since MNEF 4 (18 January 2022). • DCO application process • Planned activities and next steps.
08/02/2024	Meeting	Non-statutory	• Project update • Update on assessment work undertaken since MNEF 5 (21 September 2023) and consideration of Mooir Vannin Offshore Wind Farm • DCO application process • Planned activities and next steps. • Cumulative assessment approach and progress
Shipping and navigation consultation			
14/02/2022	Meeting	Non-statutory	• Project update • Key shipping and navigation impacts • Review of proposed approach to assessment.
14/04/2022	Meeting	Non-statutory	• To provide the evidential basis behind the current operations and constraints of ferry operations in order to inform the NRA and EIA.
01/06/2022	Letter	Non-statutory	• Letter to provide and update on the project
11/08/2022-12/08/2022	Meeting	Non-statutory	• Bridge navigation simulation preparations • Meeting for familiarisation of navigation simulation procedure for Stena Line by HR Wallingford.
23/08/2022-25/08/2022	Meeting	Non-statutory	• PEIR stage bridge navigation simulations.
03/10/2022	Meeting	Non-statutory	• Online webinar to run through the approach and process for the Hazard workshop with all Shipping & Navigation stakeholder attendees.
10/10/2022-11/10/2022	Meeting	Non-statutory	• Mona Hazard Workshop.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
23/05/2023-25/05/2023	Meeting	Non-statutory	• Environmental Statement stage bridge navigation simulations.
13/12/2023	Meeting	Non-statutory	• To provide an update following the Hazard workshops

Table 1.3: Summary of post-application consultation with Stena Line.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
01/03/2024	Meeting	Non-statutory	Discussion on residual concerns.
04/07/2024	Meeting	Non-statutory	Discussion on residual concerns.
18/10/2024	Meeting	Non-statutory	Discussion on residual effects
08/11/2024	Meeting	Non-statutory	Discussion on residual effects.
15/11/2024	Meeting	Non-statutory	Discussion on residual effects.

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, not agreed but not material, 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.
Agreed but with concerns outstanding	Position agreed but with concerns outstanding.
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 aviation and radar.

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	Stena Line Position	Status
Environmental Impact Assessment (EIA)				
STENA.SN.1	Consultation	The Applicant has undertaken adequate consultation with Stena Line on potential impacts on shipping and navigation.	Agreed Consultation carried out as per Table 1.2 above.	Agreed
STENA.SN.2	Consultation	The EIA has had due regard to matters raised by Stena Line through statutory and non-statutory consultation on potential impacts on shipping and navigation.	Position Agreed. We agree that there has been considerable focus on the NRA for Mona, Morgan and Morecambe projects. The post-PEIR reduction of the red line boundary (RLB) has returned risk levels as ALARP however we must still identify that the risk level post development in comparison to the current level is appreciably raised. Stena Line continues to explore with the Applicant the commercial aspects of development on Stena Lines business.	Position agreed but with concerns outstanding
STENA.SN.3	Baseline environment	The baseline for shipping and navigation has been appropriately characterised and appropriate data has been used to inform assessment.	Agreed. Stena Line accepts the data as presented by the Applicant for the concentration and type of marine traffic as currently using the area.	Agreed
STENA.SN.4	Baseline environment	The potential effects identified within Volume 2, Chapter 7: Shipping and navigation (APP-059) represent a comprehensive list of potential effects on shipping and navigation from the Mona Offshore Wind Project.	Agreed.	Agreed
STENA.SN.5	Assessment methodology	The assessment methodology for shipping and navigation is appropriate (including interpretation of impact and levels of significance).	Agreed.	Agreed

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.6	Assessment methodology	The navigation simulations were conducted in a fair and reasonable manner, and are appropriate for informing Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed.	Agreed
STENA.SN.7	Assessment methodology	The Hazard Workshops were undertaken allowing adequate stakeholder input into the risk assessment and are reflected within the NRA conclusions set out in section 1.11 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed.	Agreed
STENA.SN.8	Assessment methodology	Relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	The same NRA process was not applied for Mooir Vannin ORE as was applied to that of Morgan, Mona and Morecambe noting that Stena Line was not afforded the opportunity to attend the navigation simulations for Mooir Vannin.	Ongoing point of discussion
STENA.SN.9	Project design envelope	Volume 2, Chapter 7: Shipping and navigation (APP-059) has identified, described and assessed the maximum design scenario for the EIA.	Agreed.	Agreed
Navigational Risk Assessment (NRA)				
STENA.SN.10	Assessment of the effects from the Mona Offshore Wind Project alone	Hazards and impacts identified as relevant to the Mona Offshore Wind Project have been assessed within the shipping and navigation assessment.	Agreed.	Agreed
STENA.SN.11		Hazards have been assessed as either Broadly Acceptable or Tolerable (if As Low As Reasonably Practicable (ALARP)) and there are no unacceptable hazards.	Agreed. We agree that the consensus at the Haz ID Workshops returned all hazards as ALARP. The NRA post reduction of the Red line boundary has returned risk levels as ALARP however we must still identify that the risk level post development in comparison to the current level is appreciably raised.	Agreed

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.12(a)		With regards to navigational safety, the mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Except for Emergency Tow Vessels (ETV's), further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, 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. Following discussion with Stena Line on 01/10/2024, Stena Line confirmed they understand the intention for the VTMP therefore Item 1 in Stena Line's position is agreed. Items 2 and 3 remain outstanding points of discussion. The Outline Vessel Traffic Management Plan (REP3-018) has been updated at Deadline 3 to include further details around the engagement on plans through the Marine Navigation Engagement Forum. Vessel traffic monitoring required for MCA (MGN654) is set out in the Offshore In Principle Monitoring Plan (J15 F02) as part of the Navigation Monitoring Strategy.	1. We would be interested to know how the Vessel Traffic Management Plan (VTMP) will be monitored and co-ordinated from a practical perspective (Agreed).	Ongoing point of discussion

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.12(b)		With regards to navigational safety, the mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098), including ETVs, would be disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	ETV's from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk Stena line further contends, for what is currently considered an open water passage between the Bahama Bank off the North-East of the Isle of Man and the Pilot Station off Liverpool, should for any reason a vessel lose propulsion, even temporarily, the time frame for resolution of the matter is now greatly reduced and as a result there is an increased risk of allision above the current baseline. This is compounded by the fact that the current remedial action of dropping an anchor to arrest the movement of the vessel may not be advisable if undersea cables are present.. Because the time available to the Master of a disabled vessel is an ETV to cover the area would be very beneficial.	Ongoing point of discussion
STENA.SN.13		The Mona Offshore Wind Project would not interfere with sea lanes (Traffic Separation Schemes (TSS)) as defined by the NPS.	Not agreed. We disagree with the position that only IMO recognised Traffic Separation Schemes constitute Sea lanes. UNCLOS refers to both separately and furthermore states in Article 60.7: "Artificial islands, installations and structures and the safety zones around them may not be established where interference may be caused to the use of recognized sea lanes essential to international navigation."	Not agreed

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.14		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) would not be significant in EIA terms with the proposed mitigation measures in place. With regards to the impacts on radar, the Applicant refers to section 1.8.12 of the NRA (APP-098) which notes that spurious effects may be experienced, as detailed in the primary industry research. The Applicant notes, as recognised in this research and MGN 372 that such effects can be mitigated for appropriate passing distances. The Applicant also notes that Stena Line vessels are familiar with operating past offshore wind farms, including between two (Ormonde and West of Duddon Sands). When passing the centre of the route between the Mona and Morgan Array area (6 nm separation) and Mona and Morecambe Array areas (5.7 nm separation), vessels can maintain in excess of 1.5 nm from the array boundaries and other vessels and therefore mitigate the effects on radar as per MGN 372 Amendment 1 Section 2.9.2. The Applicant also notes that the National Academies study referred to by Stena Line concludes that "*larger spacing between turbines will lead to less electromagnetic interaction between turbines. Consequently, it is expected that spurious echoes due to multiple scattering between turbines will lessen as turbine spacing increases*". As such, the 1,400 m spacing between WTGs in the Mona Array Area, will likely result in having lesser effects than those currently experienced with operational wind farms which Stena Line are successfully managing.	While the position was made by the Applicant during the Simulation exercises that Marine Radar is not significantly affected by the proximity of wind turbines, the National Academies of Sciences, Engineering, and Medicine, 2022 paper Wind Turbine Generator Impacts to Marine Vessel Radar gives us cause for concern that such interference is not fully evaluated in particular when passing between two ORE projects. We continue to believe that there is an element of uncertainty as to the level of interference. The Swedish government has rejected applications for 13 offshore wind farm applications in Baltic Sea this week citing their military's concerns with regards to the possible effect on radar. While the report does not specify the areas of the radio spectrum effected it would be reassuring to understand if the Marine bands are included ie 3.02–3.1 GHz (S band) or 3.1–9.45 GHz (S and X band)	Ongoing point of discussion
STENA.SN.15		The Mona Offshore Wind Project would not have potential significant effects on strategic ferry services due to typical or adverse weather routing for Stena Line.		Position agreed but with concerns outstanding

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.16(a)	Mitigation (Mona Offshore Wind Project alone)	With regards to project-alone mitigation, none is required for typical or adverse weather routing. .	Stena Line contends that any of the four proposed projects can have an effect on the ability of a master to weather route.	Ongoing point of discussion
STENA.SN.16(b)		As inter-array, interconnector and export cables will be buried to a depth (or protected with cable protection material) informed by a Cable Burial Risk Assessment that takes on board anchor penetration and fishing gear penetration.	Is there consideration to indemnify shipping operators from losses or damages to the Applicant incurred through the emergency use of anchors, brought about by Force Majeure occurrences.	Ongoing point of discussion
Cumulative Regional Navigational Risk Assessment (CRNRA)				
STENA.SN.17	Assessment of the effects from the Mona Offshore Wind Project cumulatively	Hazards and impacts identified as relevant to the Mona Offshore Wind Project in combination with cumulative projects have been assessed within the shipping and navigation assessment.	Agreed.	Agreed
STENA.SN.18		Hazards relating to the cumulative scenario have been assessed as either Broadly Acceptable or Tolerable (if ALARP) and there are no unacceptable hazards.	The NRA post reduction of the RLB has returned risk levels as ALARP however we must still highlight that the risk level post development in comparison to the current level is appreciably raised.	Position agreed but with concerns outstanding

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.19(a)		The mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario can be considered ALARP without the need for additional risk control measures.	ETV's from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk Stena line further contends, for what is currently considered an open water passage between the Bahama Bank off the North-East of the Isle of Man and the Pilot Station off Liverpool, should for any reason a vessel lose propulsion, even temporarily, the time frame for resolution of the matter is now greatly reduced and as a result there is an increased risk of allision above the current baseline. This is compounded by the fact that the current remedial action of dropping an anchor to arrest the movement of the vessel may not be advisable if undersea cables are present. Because the time available to the Master of a disabled vessel is an ETV to cover the area would be very beneficial.	Ongoing point of discussion
STENA.SN.19(b)		With regards to navigational safety, the mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-098), including ETVs, would be disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	ETV's from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk and because the time available to the Master of a disabled vessel is limited due to the proximity of adjacent turbines an ETV to cover the area would be very beneficial (Ongoing).	Ongoing point of discussion

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.20		The Mona Offshore Wind Project in combination with cumulative projects would not interfere with traffic separation schemes (TSS).	Disagree. The Mona project potentially requires three of Stena lines Belfast – Liverpool RoRo's to deviate up to twice a day each. We contend that our current passage is a recognised sea lane as regular shipping services between the two ports have existed since 1824 and proposals to construct in those sea lanes are an "interference" potentially requiring a deviation of 1.5 Nm per crossing, up to six times per day.	Not agreed
STENA.SN.21		The Mona Offshore Wind Project in combination with cumulative projects could have potential significant effects due to: • Adverse weather routing for Stena Line	We agree with the applicants statement. Apart from the effect on weather routing could in more significant weather systems require sailings to be delayed or cancelled.	Agreed but with concerns outstanding

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.22		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario would not be significant in EIA terms with proposed mitigation measures in place. See Applicant's position for STENA.SN.14 regarding radar.	While the position was made by the Applicant during the Simulation exercises that Marine Radar is not significantly affected by the proximity of wind turbines, the National Academies of Sciences, Engineering, and Medicine, 2022 paper Wind Turbine Generator Impacts to Marine Vessel Radar gives us cause for concern that such interference is not fully evaluated in particular when passing between two ORE projects. We continue to believe that there is an element of uncertainty as to the level of interference if at all. The Swedish government has rejected applications for 13 offshore wind farm applications in Baltic Sea this week citing their military's concerns with regards to the possible effect on radar. While the report does not specify the areas of the radio spectrum effected it would be reassuring to understand if the Marine bands are included ie 3.02–3.1 GHz (S band) or 3.1–9.45 GHz (S and X band)	Ongoing point of discussion
STENA.SN.23(a)	Mitigation	With regards to the impact of adverse weather routing and impact to strategic and lifeline ferries, the parties are engaging on the nature of the solution required to address the residual moderate adverse effects. Once agreement is reached that residual effects are suitably reduced to tolerable levels, both parties will report this to the Examining Authority.	Stena Line and the Applicant are now engaging on this matter. The first meeting was 18/10/2024. The next meeting is 08/11/2024. These discussions remain ongoing.	Ongoing point of discussion

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.23(b)		As inter-array, interconnector and export cables will be buried to a depth (or protected with cable protection material) informed by a Cable Burial Risk Assessment that takes on board anchor penetration and fishing gear penetration,	Is there consideration to indemnify shipping operators from losses or damages to the Applicant incurred through the emergency use of anchors, brought about by Force Majeure occurrences.	Ongoing point of discussion