Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Mona and Isle of Man Steam Packet Company SoCG F01

Deadline: 5

Application Reference: EN010137

Document Reference: S_D5_30

Document Number: MOCNS-J3303-JVW-10471

3 December 2024

F01

Image of an offshore wind farm

www.morganandmona.com/en

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D5	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	3 Dec 2024

Prepared by:

Mona Offshore Wind Ltd.

Prepared for:

Mona Offshore Wind Ltd.

Contents

Tables

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
CPA	Closest Point of Approach
CRNRA	Cumulative regional navigational risk assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ERCoP	Emergency Response and Cooperation Plan
ExA	Examining Authority
HAZID	Hazard identification
IoMSPC	Isle of Man Steam Packet Company
MCA	Maritime and Coastguard Authority
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
NRA	Navigational Risk Assessment
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
SAR	Search and Rescue

Acronym	Description
SoCG	Statement of Common Ground
WTG	Wind turbine generator
TSS	Traffic separation schemes

Units

Unit	Description
kV	Kilovolt
m	Metre
nm	Nautical mile

1 Initial Statement of Common Ground between Mona Offshore Wind Limited and Isle of Man Steam Packet Company

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 the Isle of Man Steam Packet Company (IoMSPC), hereafter referred together as 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 IoMSPC be submitted at into the Examination at Deadline 5 in the Examining Authority's Written Questions 2 (ExQ2) (PD-018).

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 facilitate further discussion between the parties and will be updated during the Mona Offshore Wind Project Examination and submitted at Deadlines 5 and 7.

1.1.2 Mona Offshore Wind Project elements under IoMSPC's remit

1.1.2.1 IoMSPC is the world's oldest continually operating passenger shipping company, providing essential ferry services between the Isle of Man and key ports in the United Kingdom and Ireland. IoMSPC operates a fleet of passenger and freight vessels, ensuring vital connectivity for the island's residents, businesses, and tourists.

1.1.2.2 The elements of the Mona Offshore Wind Project which may affect the interests of IoMSPC are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft Development Consent Order (C1 F06).

1.1.2.3 This SoCG covers the following topics of relevance to IoMSPC:

- Shipping and Navigation.

1.1.3 Overview of 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 offshore infrastructure and consists of:

- Mona Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables and interconnector 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 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 IoMSPC within its response to Scoping, 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 IoMSPC 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 0: 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 phases of the Mona Offshore Wind Project. The agreement logs present the updated position reached on 03 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

1.2.3 Summary of consultation

1.2.3.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with IoMSPC during the pre-application phase of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with IoMSPC during the post-application phase of the Mona Offshore Wind Project.

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Marine Navigation Engagement Forum (MNEF)			
10/11/2021	Meeting 1	Non-statutory	• Project introduction and proposed approach • Site selection in relation to shipping and navigation constraints • Impacts of COVID-19 on data collection • Relation of impacts on ferry routes with regulation and guidance • Sensitivity of ferry operator schedules.
06/05/2022	Meeting 2	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 3	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 4	Non-statutory	• Project update • Cumulative assessment approach and progress • Update on assessment work completed since MNEF 3 – 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
08/02/2024	Meeting 6	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
04/04/2022	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 and to request additional attendance at the navigation simulation.
20/07/2022 – 21/07/2022	Meeting	Non-statutory	• Bridge navigation simulation preparations • Meeting for familiarisation of navigation simulation procedure for IoMSPC by HR Wallingford.
17/08/2022-19/08/2022	Navigation Simulations	Non-statutory	• PEIR stage bridge navigation simulations
10/10/2022-11/10/2022	Hazard workshop	Non-statutory	• Mona Hazard Workshop
13/09/2023-14/09/2023	Navigation Simulations	Non-statutory	• Environmental Statement stage bridge navigation simulations
28/09/2023-29/09/2023	Hazard workshop	Non-statutory	• In person hazard workshop • Cumulative NRA hazard workshop undertaken to inform the Environmental Statement • Mona NRA hazard workshop undertaken to inform the Environmental Statement
11/12/2023	Meeting	Non-statutory	• To provide an update following the Hazard workshops

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
24/06/2024	Meeting	Non-statutory	Review of residual concerns

1.3 Agreement log

1.3.1 Overview

1.3.1.1 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.
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.

1.3.1.2 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application in relation to shipping and navigation.

1.3.2 Shipping and navigation

Table 1.5: Agreement Log between the parties on shipping and navigation.

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
Environmental Impact Assessment (EIA) and Navigational Risk Assessment (NRW)				
IoMSPC.EIA.1	Consultation	The Applicant has undertaken adequate consultation with IoMSPC on potential impacts on shipping and navigation.	Agreed in meeting with Morgan Generation Assets on 05/09/24	Agreed
IoMSPC.EIA.2	Baseline environment	The baseline activity for shipping and navigation has been appropriately characterised and appropriate data has been used to inform the assessment.	Agreed in meeting with Morgan Generation Assets on 05/09/24	Agreed
IoMSPC.EIA.3	Assessment methodology	The assessment methodology for shipping and navigation is appropriate (including the potential effects and interpretation of impact and levels of significance, as well as the relevant cumulative projects). The hazards and impacts identified are relevant to the Mona Offshore Wind Project.	Agreed in meeting with Morgan Generation Assets on 05/09/24	Agreed
IoMSPC.EIA.4	Compliance with MGN654	The Applicant has undertaken the assessment in accordance with MGN654. This includes appropriate navigation simulations, an adequate Hazard Workshop allowing stakeholder input into the risk assessment, both of which are reflected within the Volume 4, Annex 7.1: Navigational Risk Assessment and Cumulative Regional Navigational Risk Assessment (CRNRA) (APP-098) conclusions.	Agreed in meeting with Morgan Generation Assets on 05/09/24	Agreed

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
Safety of navigation				
IoMSPC.SN.1	Safe routes for shipping	The passage between Morgan Array Area and Walney Offshore Wind Farms (with a width of 4.1 nm to 5.3 nm), Mona and Morecambe (5.7 nm) and Mona and Morgan (6 nm) is acceptable in most weather conditions and credible traffic situations to ensure safe action can be taken to maintain CPA of >1 nm from other vessels structures (as demonstrated during the navigation simulations with IoMSPC in September 2023). Therefore, and as consensus reached amongst participants at the Hazard Workshop held in Liverpool in September 2023 with IoMSPC representation, all unacceptable hazards had been reduced to Medium Risk and that further mitigation discussed (such as introducing traffic lanes) would be disproportionate to the level of risk and therefore could be concluded to be As Low as Reasonably Practicable (ALARP).	In typical weather, safe routes for shipping are possible. Discussed during meeting with Morgan Generation Assets on 04/11/2024.	Agreed
IoMSPC.SN.2		In adverse weather, for a passage between Liverpool and Douglas, it may not be safe or prudent for a vessel to proceed between Mona and Morecambe Array Areas or between Mona and Morgan Array Areas, due to the potential for adverse vessel motions which could detrimentally affect passenger comfort, personnel safety and cargo security. Therefore, masters may choose to take a longer passage around the offshore wind farms which would incur either increased delays, operational impacts or cancellations to IoMSPC services.	In bad weather, safe routes for shipping are not achieved due to poor visibility. Whilst this impact is agreed tolerable and ALARP, it is still an increased risk over the baseline.	Agreed

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SN.2.1		In adverse weather, for a passage between Heysham and Douglas, it may not be safe or prudent for a vessel to proceed between Walney and Morgan Array Areas, due to the potential for adverse vessel motions which could detrimentally affect passenger comfort, personnel safety and cargo security. Therefore, masters may choose to take a longer passage around the offshore wind farms which would incur either increased delays, operational impacts or cancellations to IoMSPC services.	In bad weather, safe routes for shipping are not achieved due to poor visibility and presence of existing offshore rigs. Discussed during meeting with Morgan Generation Assets on 04/11/2024.	Agreed

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SN.3		When considering all projects, including the pre-application Mooir Vannin project, the sea room between the Morgan Array Area and Mooir Vannin Scoping boundary is insufficient, leading to unacceptable allision and collision risk hazards as assessed within the CRNRA Appendix D (APP-098). The Applicant notes this impact is independent of the Mona Offshore Wind Project.	2.7 nm corridor between Morgan Generation Assets and Mooir Vannin scoping boundary is not acceptable. A gap either side of a single vessel passing centrally between the array areas is 1.35 nm. A 'C' distance of 1.35 nm as per MGN654 Annex 2 corresponds to a MEDIUM risk where compliance with the COLREGS may be challenging as well as likely S-Band radar/ARPA interference. This situation is not considered safe nor acceptable by IOMSPC for safe navigation of passenger ships, especially high-speed passenger craft. In addition, where two ships pass one another in a gap of 2.7 nm a risk of LOW cannot be achieved. The following risk factors will be encountered: Vessel passing distance >0.7 nm – the risk is HIGH with the windfarms. Vessel passing distance <0.7 nm – the risk is MEDIUM with the windfarms. Such a passing distances may not be considered safe by ship Masters, particularly high-speed craft at full speed, eg 35 kts with 900 passengers on board. Safety measures such as considerable speed reduction may have to be implemented leading to schedule delays. No regulatory routeing measures nor traffic control measures are in place nor proposed therefore a risk of HIGH or MEDIUM cannot be considered as "tolerable with ALARP measures" implemented. The IOMSPC opines for conventional passenger ferries and high speed passenger craft the risk for Isle of Man lifeline passenger ships passing other vessels within the bottleneck area between the proposed Mooir Vannin and Morgan Array Areas should be LOW (MGN 654 Annex 2) for x2 vessels while maintaining a safe passing distance.	Agreed

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SN.4	Traffic separation schemes	The Mona Offshore Wind Project would not interfere with traffic separation schemes (TSS).	Agreed	Agreed
Search and rescue				
IoMSPC.SAR.1	Post consent plans	The likelihood of requiring SAR activities within the Mona Offshore Wind Project is shown to be low through the NRA (APP-098), and the risks of collision and allision are assessed as Medium Risk – Tolerable if ALARP. The Mona Offshore Wind Project array layout will be designed to facilitate safe and effective SAR by vessels or helicopters. The NRA (APP-098) and chapter (APP-025) concluded that the impact on SAR as a result of the Mona Array Area was minor due to embedded mitigations consistent with MGN654 Annex 5 but particularly: • Development of Emergency Response and Cooperation Plan (ERCoP) with MCA. • Two lines of orientation. • >1,400m between wind turbine generators (WTGs)/OSPs. Detailed SAR plans will not be developed until post-consent, as the layout and construction methods has not yet been determined. Therefore, the Applicant will not be in position to commence works until the Search and Rescue (SAR) plan has been approved by the MCA (who will only do so once they are confident that the final design ensures risk to SAR operations are acceptable). These elements are secured within the draft Development Consent Order (C1 F06) and deemed marine licences in the relevant conditions, such as Condition 22 for Offshore Safety Management of the draft Development Consent Order (C1 F06).	IoMSPC cannot comment on SAR until plans have been confirmed, however IoMSPC note that plans will be developed subject to approval by the MCA. Discussed during meeting with Morgan Generation Assets on 04/11/2024.	Agreed

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SAR.2	Effects on Radar	Section 1.8.11 of the NRA (APP-098) notes that adverse effects on radar can be experienced for vessels passing close to Offshore Wind Farms (OWFs), which vessel masters routinely experience and will be familiar with. The NRA concludes that the spacing between turbines is greater for the Mona Offshore Wind Project compared to existing Irish Sea projects and therefore there will be greater clarity in terms of radar detection between WTGs than that already experienced.	IoMSPC understand that X-band radar can used but believe there may be limitations for S-band within close proximity of wind farm arrays. Risk with 2 nm passing distance in adverse weather/reduced visibility and possibility of radar interference.	Agreed
Operational Impacts to IoMSPC				
IoMSPC.OI.1	Mona Array Area (in isolation)	The Mona Offshore Wind Project could have potential significant effects on lifeline ferry services due to adverse weather routing for IoMSPC route between Liverpool and Douglas.	IoMSPC agrees with this statement. Significant effects include the likelihood of delays or cancellations increasing.	Agreed
IoMSPC.OI.2	Mitigation (in isolation)	With regards to adverse weather routeing, the parties are engaging on a ferry mitigation agreement to address the residual moderate effect for the route between Liverpool and Douglas in adverse weather conditions. IoMSPC has also requested that the Applicant consult with the Isle of Man Chamber of Commerce and the Isle of Man Government regarding the potential economic impact, particularly in relation to supply chain disruptions. The Applicant is engaging on this matter through the Isle of Man Territorial Seas Committee (IoMTSC) who represent the Isle of Man Government including the Chamber of Commerce and other Manx stakeholders. The Applicant and the IoMTSC submitted the latest update to the SoCG at Deadline 5 (S_D1_11 F03). The Applicant will keep the ExA informed on the progress of these discussions throughout the Examination.	IoMSPC agrees with this statement and adds that the ferry mitigation agreement will also need to take account of increased costs associated with the UK Emissions Trading Scheme (UK ETS) resulting from increased emissions associated with route diversions.	Ongoing point of discussion

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.OI.3	Assessment of the effects from the Mona Offshore Wind Project cumulatively (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) (CRNRA)	The Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Scoping Boundary) could have potential significant effects due to adverse weather routing for IoMSPC between Liverpool and Douglas and Heysham and Douglas.	IoMSPC agrees with this statement. Significant effects include the likelihood of delays or cancellations increasing.	Agreed
IoMSPC.OI.4	Mitigation (cumulative excluding Mooir Vannin Scoping Boundary)	With regards to adverse weather routeing, the parties are engaging on a ferry mitigation agreement to address the cumulative impact of adverse weather routeing. IoMSPC has also requested that the Applicant consult with the Isle of Man Chamber of Commerce and the Isle of Man Government regarding the potential economic impact, particularly in relation to supply chain disruptions. The Applicant is engaging on this matter through the Isle of Man Territorial Seas Committee (IoMTSC) who represent the Isle of Man Government including the Chamber of Commerce and other Manx stakeholders. The Applicant and the IoMTSC submitted the latest update to the SoCG at Deadline 5 (S_D1_11 F03). The Applicant will keep the ExA informed on the status of these discussions throughout the Examination.	IoMSPC agrees with this statement and adds that the ferry mitigation agreement will also need to take account of increased costs associated with the UK Emissions Trading Scheme (UK ETS) resulting from increased emissions associated with route diversions.	Ongoing point of discussion