

MONA OFFSHORE WIND PROJECT

Response to Ørsted IPs D5 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.
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,

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	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.

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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).

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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

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Units

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

1 Response to Ørsted IPs D5 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Ørsted IPs Deadline 5 submission below.

2 Response to Ørsted IPs D5 Submission

Table 2.1: REP5-117 Ørsted IPs

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-117.1	<p>1. Introduction</p> <p>1.1 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 submission.</p> <p>1.2 At deadline 4 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”), the Applicant filed a number of documents relating to the ecological effects of the Project which the Ørsted IPs wish to respond to. The Ørsted IPs also wish to briefly respond to a point made by the Applicant in its comments on the Ørsted IPs EXQ1 responses regarding shipping and navigation.</p> <p>1.3 In this submission, the Ørsted IPs respond to the following documents:</p> <p>1.3.1 ‘Updated Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note’ (the “Technical Note”);1</p> <p>1.3.2 Response to REP4-079 in respect of shipping and navigation.</p>	<p>The Applicant notes Ørsted Interested Parties (IP's) position.</p>
REP5-117.2	<p>2. Response to the Technical Note</p> <p>2.1 The Ørsted IPs provided an initial response to the Applicant's deadline 3 version of the Technical Note, recording that they were considering the Technical Note in the context of the other proposed developments (namely, the Morgan and Morecambe offshore wind farms). An updated version of the Technical Note was filed at examination Deadline 4.</p> <p>2.2 Following this further consideration, the Ørsted IPs have identified an issue with the Applicant's approach to the cumulative collision risk assessment. The Applicant has incorrectly recorded that Barrow Offshore Windfarm has a predicted lifespan which ends before the construction of the Project.</p> <p>2.3 The Applicant has cited the expiry of a marine licence which authorises maintenance of the Barrow Offshore Windfarm to justify this approach. However, this licence does not relate to the operation of the development. The Ørsted IPs understanding is that no additional consents are required to continue operating Barrow Offshore Windfarm beyond 2026.</p> <p>2.4 Therefore, Barrow Offshore Windfarm should be included in the Applicant's cumulative effects assessment. Excluding this development from assessment runs counter to the precautionary principle and creates a risk that cumulative effects are not accurately assessed.</p>	<p>Barrow Offshore Wind was not initially included in the gap-fill exercise as the Applicant understood that the marine licence would expire before the Mona Offshore Wind Project is expected to be commissioned. The Applicant notes the updated information provided by the Ørsted IPs in this representation, although wishes to highlight that none of the statutory nature conservation bodies (SNCBs) have raised the absence of a quantified impact estimate for Barrow Offshore Wind Farm as a concern in the Mona Offshore Wind Project Examination.</p> <p>In light of Ørsted IP's comment and for completeness, the Applicant intends to update the cumulative effects assessment (CEA) and in-combination assessment to include an indicative impact estimate for Barrow Offshore Wind Farm as well as North Hoyle Offshore Wind Farm, which the Applicant understands is in a similar position . This information will be included in an update to Volume 2, Chapter 5: Offshore Ornithology and the HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments submitted at Deadline 7. This will constitute a minor update to the CEA and in-combination assessments. Therefore, the Applicant does not consider that it will alter the conclusions drawn in the EIA and HRA materials or the conclusions reached by the SNCBs. Nonetheless, to enable the relevant IPs to have regard to this information within their Closing Statements, the updated assessments will be shared with these IPs (for information purposes only) ahead of Deadline 7.</p>
REP5-117.3	<p>3. Response to REP4-079</p> <p>3.1 The Applicant has provided its comments on the Ørsted IPs ExQ1 responses in REP-079. The Ørsted IPs consider their submissions regarding wake loss at deadline 32 cover the Applicant's comments at REP103.1-REP103.5 and do not propose to repeat that information in this submission.</p> <p>3.2 In respect of the Applicant's comments at REP3.103.6-REP3.103.7, the Ørsted IPs reiterate that they require to be specifically engaged with in respect of the shipping and navigation risks arising from the development and how those will be managed (as relevant to the interface with the Ørsted IPs' developments). This interface would cover Emergency Response and Cooperation Plan (ERCOP) and the Marine Pollution Contingency Plan (MPCP).</p> <p>3.3 In light of the cumulative risks to shipping and navigation at their developments, the Ørsted IPs consider a formal commitment to such engagement would be appropriate in the Project's Outline Vessel Traffic Management Plan (“OVTMP”).3 The Ørsted IPs seek to be specifically named as consultees at 1.6.2 of that document.</p> <p>3.4 Importantly, this will provide greater certainty that the parties ultimately responsible for the construction of the Project are aware that the Ørsted IPs must be consulted with. The Ørsted IPs considers there is a risk that in relying on the umbrella consultee categories included in the OVTMP (which includes “existing users of the relevant sea” and “relevant stakeholders”), those ultimately implementing the OVTMP may not be aware that the Ørsted IPs require to be consulted. Lack of engagement could have important consequences for the successful coexistence of the Project with the Ørsted IPs' developments.</p>	<p>The Applicant is confident it has suitably secured appropriate engagement with stakeholders through the Marine Navigation Engagement Forum (MNEF) post-consent (including Ørsted IPs) which includes development of relevant documentation as appropriate and described in the Applicant's response to ExQ1.15.5 and ExQ1.15.6 (REP3-062) and in the Applicant's response to Ørsted IPs ExQ1 Responses (REP4-079).</p> <p>The Outline Vessel Traffic Management Plan (VTMP) (REP3-018) already notes in Section 1.6.2.1 that “<i>Consultation will be undertaken with the following stakeholders and groups of stakeholders in the development of the VTMP...Existing users of the relevant sea area to ensure that the VTMP addresses potential and actual consultee vessel interactions with project vessels using relevant sea area.</i>” This would include Ørsted IPs as well as the operators of other adjacent developments and the Applicant does not consider it necessary or appropriate to name one party and not others and risks making the VTMP overly prescriptive. The Applicant does not believe that it is credible that the plan will be developed without consideration of the impacts and co-existence with Ørsted IP activities and assets.</p> <p>NRW is the appropriate (competent) authority for discharging these plans and they will consult with the Maritime and Coastguard Agency (MCA) and Trinity House on relevant matters. The Applicant will also ensure that Ørsted IPs have copies of all relevant plans which will be operationally useful or support navigational safety in the eastern Irish Sea (such as the VTMP/Emergency Response and Cooperation Plan (ERCoP)) following approval by the licencing authority in consultation with the MCA and Trinity House.</p>