

MONA OFFSHORE WIND PROJECT

Mona and Ørsted Interested Parties SoCG

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Image of an offshore wind farm

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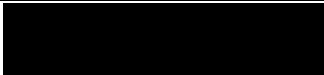
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Glossary

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
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
GHG	Green House Gas
HAZID	Hazard identification
IoMSPC	Isle of Man Steam Packet Company
IPs	Interested Parties
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

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Acronym	Description
PEIR	Preliminary Environmental Information Report
SAR	Search and Rescue
SoCG	Statement of Common Ground
TSS	Traffic separation schemes
WTG	Wind turbine generator

Units

Unit	Description
kV	Kilovolt
m	Metre
nm	Nautical mile

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1 Statement of Common Ground between Mona Offshore Wind Limited and Ørsted Interested Parties

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 Ørsted Interested Parties (Ørsted IPs), 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 the Ørsted IPs be submitted into the Examination 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 6 and 7.

1.1.2 Mona Offshore Wind Project elements under the Ørsted IPs’ remit

1.1.2.1 The Ørsted IPs are other offshore wind farm operators in the east Irish Sea who have made representations in relation to the Mona Offshore Wind Project.

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

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

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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 Examination phase and will continue to 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 the Ørsted IPs within its response to Scoping and Section 42 consultation. This SoCG also includes those issues raised by the Ørsted IPs 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 phases of the Mona Offshore Wind Project. The agreement logs present the updated position reached on 20 December 2024 (Deadline 6).

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
Proximity and co-existence	Agreed
Offshore ornithology cumulative & in-combination assessment	Some areas Not Agreed – material impact, some ongoing points of discussion
Wake effects	Not Agreed – material impact
Aviation and radar	Ongoing point of discussion

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Topic	Agreement status
Shipping and navigation	Not Agreed – material impact

1.3 Summary of consultation

1.3.1 Overview

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with the Ørsted IPs 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 the Ørsted IPs during the post-application phase of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with the Ørsted IPs.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Statutory (Section 42) consultation			
02 June 2023	Barrow Offshore Wind Limited, Burbo Extension Ltd, Ørsted Burbo (UK) Limited, Morecambe Wind Limited, Walney (UK) Offshore Windfarms Limited, Walney Extension Limited submitted Section 42 responses	Statutory	<ul style="list-style-type: none"> The need for continued access to the offshore wind assets for maintenance, and for any upgrading, repowering or decommissioning activities Potential for the Mona Offshore Wind Project turbines to interfere with wind speed or wind direction of the existing Barrow, Burbo Bank, Burbo Extension, West of Duddon Sands, Walney 1 and 2, and Walney 3 and 4 offshore wind farms, causing a reduction in energy output.
Shipping and navigation consultation			
28/09/2023-29/09/2023	Hazard workshop	Non-statutory	<ul style="list-style-type: none"> In person hazard workshop Cumulative NRA hazard workshop undertaken to inform the Environmental Statement Mona Offshore Wind Project NRA hazard workshop undertaken to inform the Environmental Statement

Table 1.3: Summary of post-application consultation with the Ørsted IPs.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
06 May 2024	Barrow Offshore Wind Limited, Burbo Extension Ltd, Ørsted Burbo (UK) Limited, Morecambe Wind Limited, Walney (UK) Offshore Windfarms Limited, Walney Extension Limited submitted Relevant Representations	Statutory	Relevant representations submitted by the Ørsted IPs.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
27 November 2024	Meeting with Ørsted IPs	Non-Statutory	Discussion on scope and process for SoCG
13 December	Meeting with Ørsted IPs	Non-statutory	Discussion on content of SoCG
13 January	Meeting with Ørsted IPs	Non-statutory	Discussion on content of SoCG

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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.
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 in relation to shipping and navigation.

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1.4.2 Effects to existing and proposed infrastructure, including wake effects

Table 1.5: Agreement Log between the parties on Effects to existing and proposed infrastructure, including wake effects.

Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
Proximity and co-existence				
OIP.OWF.1	Proximity	<p>The Ørsted IPs represent the following operational offshore wind farms in the east Irish Sea which are presented together with distance from the Mona Array Area (as set out in Table 10.10 of Volume 2, Chapter 10: Other sea users (APP-062)):</p> <ul style="list-style-type: none"> Burbo Bank Extension (30.6 km) Walney Extension (30.7 km) West of Duddon Sands (31.9 km) Walney 1 and 2 (34.1 km) Burbo Bank (40.3 km) Barrow (43.3 km). 	Agreed	Agreed
Offshore ornithology cumulative & in-combination assessment				
OIP.OO.1	Offshore ornithology cumulative and in-combination assessment (raised by Barrow Offshore Wind Limited, Burbo Extension Ltd, Morecambe Wind Limited, Ørsted Burbo (UK) Limited, Walney	<p>The Applicant has undertaken a suitably robust assessment of all potential impacts on offshore ornithology informed by appropriate data sources from site-specific surveys and detailed desktop studies, in accordance with relevant guidance. The assessment of potential impacts to offshore ornithology is presented in Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) and the HRA Stage 2 information to support an appropriate assessment (ISAA) Part Three: Special Protection Areas and Ramsar Sites assessments (E1.3 F03). The Applicant wishes to highlight that three additional annexes to the Environmental Statement / ISAA have been submitted at Deadline 7, which update/repackage relevant examination materials. These include:</p>	<p>The Ørsted IPs acknowledge that the Applicant has provided an update to the CEA to include the previously omitted Barrow Offshore Wind Farm, include the previously omitted Barrow OWF.</p> <p>However, the CEA was received on the 8th January which does not allow sufficient time to review the validity of the document. The Ørsted IPs therefore require further time to assess these updates.</p> <p>Furthermore, Ørsted IPs received the ISAA documents on the 13th January, and therefore have not been provided sufficient time to assess these updates.</p>	Not agreed

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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
	Extension Limited and Walney (UK) Offshore Windfarms Ltd)	<ul style="list-style-type: none"> F6.5.7: Offshore Ornithology Assessment of Pen y Gogarth/Great Orme's Head Site of Special Scientific Interest Technical Report E1.3.1: Offshore ornithology ISAA Supporting Information E1.3.2: Assessment of proposed Ramsar Sites within the Isle of Man. 		
OIP.OO.2	Gap filling of historical offshore wind farms	<p>The Applicant notes the Ørsted IPs Comments on Deadline 4 Submissions (REP5-117) requesting that quantified predicted impacts for Barrow Offshore Wind Farm be included in the Applicant's cumulative effects assessment (CEA) given the potential for the project to repower.</p> <p>To address this matter, the Applicant has updated the CEA in Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) at Deadline 7 to include indicative estimates for Barrow (and North Hoyle) Offshore Wind Farm. To enable the Ørsted IPs to have regard to this information within their Closing Statement, a draft version of the updated Environmental Statement was shared with the Ørsted IPs (via email on 8 January 2025) in advance of Deadline 7.</p>	<p>The Ørsted IPs acknowledge that the applicant has provided an update to the CEA to include the previously omitted Barrow Offshore Wind Farm, however insufficient time has been provided to review the validity of the CEA and the ISAA (see OIP.OO.1 comments above).</p> <p>The Ørsted IPs therefore require further time to sufficiently review these updated documents.</p>	Not agreed
Wake effects				
OIP.WE.1	Wake effects (raised by Barrow Offshore Wind Limited, Burbo Extension Ltd, Morecambe Wind Limited, Ørsted Burbo (UK) Limited,	<p>There is a fundamental disagreement between the Parties on wake loss and the ExA should refer to each Party's latest written submission for the most up to date position.</p> <p>In summary the key points of disagreement are:</p> <ul style="list-style-type: none"> The Application documents include sufficient information for an assessment of the Mona Offshore Wind Project against the policies in National Policy Statement (NPS) EN-1 and EN-3. The correct interpretation of the NPS and the application of relevant policy to the Mona Offshore Wind Project 	<p>The Ørsted IPs commissioned an independent wake report which demonstrated that the Mona Offshore Wind Project will adversely affect the energy yield of their developments. Furthermore:</p> <ul style="list-style-type: none"> The Ørsted IPs have stated that this impact should have been fully assessed by the Applicant as part of the site selection process. The Applicant denies that wake will have a significant impact and is continuing to refuse to undertake an assessment. 	Not Agreed – material impact

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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
	Walney Extension Limited and Walney (UK) Offshore Windfarms Ltd)	<p>application does not require any further 'wake assessment' to be undertaken or submitted.</p> <ul style="list-style-type: none"> The Applicant has followed EIA legislation and undertaken its baseline characterisation and assessment appropriately (Volume 2, Chapter 10: Other sea users (APP-062)). There is no policy stating an assessment of wakes is required at any distance. If an assessment was required, there is not a robust or recognised approach to undertake it. The Applicant has amended the boundary closest to the Ørsted IPs following statutory pre-application consultation (Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-016)), increasing the distance between the projects. The amendment in the boundary follows the mitigation hierarchy. The Applicant has presented a Technical Note: Calculation of the Net Effects on Greenhouse Gas Emissions (S_Ex_1), shared with the Ørsted IPs on 9 January and accepted into the examination on 10 January. The note sets out that the greenhouse gas assessment as presented in the Mona application adequately dealt with any potential impact wakes effects on external projects energy yield, but even if reassessed, the conclusion remains valid. The note also demonstrates, from first-principles (rather than using a project-specific assessment, given the Applicant's inability to do this for reasons set out in submissions) that amending the Mona project boundary, or other spatial/layout mitigations, would have a limited benefit to distant external projects but a relatively significantly detrimental impact on Mona, and are therefore not suitable. 	<ul style="list-style-type: none"> The terms of NPS EN-3 are unambiguous in their requirement to carry out an assessment (see paragraph 2.8.197-2.9.198). The necessary data and modelling tools to undertake such an analysis is available to the Applicant. Wake loss modelling, within and between wind farms, is not novel, it underpins all investment decisions in the wind industry. Similarly, The Crown Estate's response to the Outer Dowsing examination confirms that the Applicant cannot rely on compliance with the boundary requirements in TCE's Round 4 Leasing Information Memorandum to justify not carrying out a detailed assessment. There are now limited coexistence options available to address this issue. Those options are (1) to modify site layout or project design; (2) to modify the operation of the development (for instance through wind sector management or wake steering); or (3) to privately negotiate compensation, noting that the latter is a standard outcome across the UK wind industry. The Applicants shared with the Ørsted IPs a Technical Note on the 9th January: Calculation of Net Effects on Greenhouse Gas Emissions. Given that the final deadline occurs three working days later (on the 14th January), the Ørsted IPs have not had the opportunity to thoroughly review the document. However, the initial review points to key methodology flaws. Firstly, the assessment uses the earliest decommissioning dates for the Ørsted IPs developments, thus adopting a 'best-case' approach (rather than the standard worst-case approach), which ignores the energy production from the Ørsted IPs' assets throughout their potential up to ten years lifetime extension. This omission considerably understates the full impact of wake 	

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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
			losses on the Ørsted IPs and hence overstates associated reduction in GHG emissions credited to the Applicant developments. Secondly, scenario c), which calculates one potential mitigation for wake effects based on a "generic model", is inappropriate as it draws a broad conclusion about national GHG emissions reduction without making use of readily available site-specific inputs or analysing real world mitigations.	

Aviation and radar

OIP.A&R.1	Aviation and radar (raised by Burbo Extension Ltd and Walney Extension Limited)	<p>The Applicant has received an objection from the MOD Defence Infrastructure Organisation (DIO) dated 06 August 2024 (REP1-054) in relation to the Air Traffic Control (ATC) radar at BAE Warton. The Applicant has progressed a SoCG with DIO on this matter. The Applicant is in discussion with BAE Systems and the DIO regarding mitigation, which will be agreed with BAE Systems and the DIO where necessary to ensure significant effects are avoided. Therefore, the Applicant has no reason to believe that the Mona Offshore Wind Project might adversely affect or increase the cost of the mitigation put in place by Burbo Extension Ltd or Walney Extension Limited related to Warton Aerodrome Primary Surveillance Radar (PSR). Any agreement which may be required with BAE Systems related to the funding of mitigation will be made exclusively between the Applicant and BAE Systems.</p> <p>At this time the nature of the Ørsted IPs' mitigation deployed at BAE Warton, and whether its application would extend to the Mona Offshore Wind Project, is unknown to the Applicant. The Applicant is also unaware as to whether such mitigation is contractually underpinned between BAE Systems and Ørsted IPs by cost sharing principles or similar. As noted above, any agreement which may be required with BAE Systems related to the funding of mitigation will be</p>	<p>Burbo Extension Ltd and Walney Extension Limited are implementing appropriate mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar (PSR).</p> <p>As such, it is inappropriate for the Applicant to assume that Mona Offshore Windfarm project will not "adversely affect or increase the cost of the mitigation".</p> <p>Burbo Extension Ltd and Walney Extension Limited require assurance that the Applicant will not adversely affect or increase the cost of such mitigation and that, in the event that the Applicant draws beneficial use of this mitigation, the Applicant will contribute to the purchase, installation and maintenance costs.</p> <p>For the avoidance of doubt, the point of disagreement being contended here is the Applicant's refusal to provide assurance to Burbo Extension Ltd and Walney Extension.</p> <p>It is widely acknowledged that CAPEX and OPEX cost-sharing across beneficial users of both defence and civilian PSR mitigation solutions has been standard practice across the UK wind industry for more than a decade.</p>	Not Agreed – material impact
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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
		made exclusively between the Applicant and BAE Systems. The Applicant would welcome further clarity to enable resolution of any residual concern on this matter.		

Shipping and navigation

OIP.S&N.1	Marine Navigation Engagement Forum (MNEF) pre-application	The Applicant established a MNEF to engage stakeholders in the pre-application process. This included hosting a Hazard Workshop to discuss findings of the Navigational Risk Assessment (NRA) and Cumulative Regional Navigational Risk Assessment (CRNRA). Ørsted IPs were invited to attend the Hazard Workshop in September 2023.	Ørsted IPs confirm engagement with both the MNEF and the Hazard Workshops from September 2023.	Agreed
OIP.S&N.2	MNEF post-consent	The Applicant has committed to ongoing engagement with stakeholders (including the Ørsted IPs) via the MNEF. Details of this are set out in the Outline Vessel Traffic Management Plan (REP6-029), which was updated at Deadline 6 to include a commitment to facilitating the MNEF for a minimum 5 years into the operational and maintenance phase.	Ørsted IPs welcome the Applicant's commitment, as stated in the cell opposite, to ongoing engagement and wish to secure this outcome via the appropriate Plan. Ørsted IPs note that they are still not named within the Outline Vessel Traffic Management Plan.	Not Agreed – Material Impact
OIP.S&N.3	Shipping and navigation	The Applicant notes that the Ørsted IPs shipping and navigation concerns are only for West of Duddon Sands (Morecambe Wind Limited) and Walney Extension and therefore shipping and navigation is not a concern for the other Ørsted IP projects.	Ørsted IPs shipping and navigation concerns cover West of Duddon Sands (Morecambe Wind Limited), Walney Extension and Barrow.	Not Agreed – Material Impact
OIP.S&N.4	Shipping and navigation	The Applicant notes that West of Duddon Sands is located 17.2 nm to the northeast of the Mona Array Area. The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the MNEF post-consent, which includes offshore wind energy developers. This will include the post-consent documentation, including the ERCoP, MPCP and VTMP, once approved by the licencing authority, a commitment which was included in the updated	Involvement in the MNEF post-consent is not considered sufficient by the Ørsted IPs as a mechanism for ensuring that the details of the VTMP do not present significant risk to the IPs operations considering that the Mona Offshore Wind Project influences cumulative routeing within the area, including shipping routes now passing in closer proximity to the Ørsted IP's operational assets, and given that the location of the Applicant's construction and O&M bases remains unconfirmed at the time of writing.	Not Agreed – Material Impact

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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
		<p>Outline VTMP submitted at Deadline 6 (REP6-029). Additionally, the Applicant has made a commitment to facilitating the MNEF for a minimum 5-years into the operational and maintenance phase as set out in OIP.S&N.2.</p> <p>The Applicant understands through ongoing discussion with Ørsted IPs that there is concern that engagement with shipping operators could result in an increased collision/allision risk to Ørsted assets. The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users, including collision and allision risk with existing operational windfarms within the shipping and navigation study area presented in the CRNRA (Appendix E of Volume 6, Annex 7.1: Navigational risk assessment (APP-098)). It was concluded that all hazards had been reduced to As Low As Reasonably Practicable or Broadly Acceptable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational risk assessment (APP-098)).</p> <p>Ongoing engagement with vessel operators relating to residual concerns do not relate to navigational safety and therefore would not result in any changes in risk to the Ørsted IPs' developments.</p> <p>The Applicant is committed to continuing the MNEF post-consent and this will include engagement on the relevant shipping and navigation documentation once agreed with the relevant statutory authority.</p>	<p>It is not understood whether the MNEF is specific to Mona Offshore Wind Farm, nor what the terms of reference for the Forum are. In the interests of safety of navigation within the vicinity of the Ørsted IP's assets, the Ørsted IPs wish to secure an opportunity to review and comment on the VTMP in conjunction with its submission to the Licensing Authority pre-construction as a named consultee in this Plan. The Ørsted IPs also expect close co-operation on the Marine Pollution Contingency Plan (MPCP) and Emergency Response Co-operation Plan to ensure mutually beneficial outcomes.</p> <p>OIP.S&N.5 presents the Ørsted IP's position on the adequacy of the Applicant's Navigational Risk Assessment (NRA). Specifically, the Applicant has not committed to stating that the risk that directly impacts the Ørsted IP's assets remains within ALARP parameters, and whether additional mitigations are required for those projects to achieve that ALARP status.</p>	
OIP.S&N.5	Shipping and navigation	<p>The Applicant notes that 'accidental pollution during all phases of the development' was scoped out of the Mona Offshore Wind Project Environmental Impact Assessment (EIA) as agreed with the Planning Inspectorate in the Scoping Opinion, on the basis that this will be mitigated through management practices including an Offshore Environmental Management Plan (OEMP) and a Marine Pollution Contingency Plan (MPCP) (paragraph 67 of the Scoping Opinion (APP-</p>	<p>When the list of impacts contained within Table 7.40 (Summary of potential effects, mitigation and monitoring) of the Shipping and Navigation Chapter [APP-059- Environmental Statement - Volume 2, Chapter 7: Shipping and navigation] are considered, increased allision risk to existing assets (including operational offshore wind farms) does not appear to be listed alongside the risk to vessels, ports and search & rescue. Nor is it considered within APP-062</p>	Not Agreed – Material Impact

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Reference Number	Discussion point	Applicant's Position	Ørsted IPs' Position	Status
		<p>194)). The Applicant has committed to preparing an OEMP, which includes a MPCP, to minimise and manage the risk of marine pollution events. The OEMP is secured as a condition of the deemed Marine Licence within the draft DCO (C1 F06).</p> <p>The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-059) to continue engagement with all stakeholders through the MNEF post-consent (for a minimum of 5-years as set out in OIP.S&N.2), which includes offshore wind energy developers. This will include the post-consent documentation as appropriate including the MPCG as secured through updates to the Outline VTMP as set out in OIP.S&N.4. above.</p> <p>The Applicant understands through ongoing discussion with Ørsted IPs, there is concern that engagement with shipping operators could result in an increased collision/allision risk to Ørsted IP assets. The Applicant has assessed the potential impacts of the Mona Offshore Wind Project on navigational risk for all marine users, including collision and allision risk with existing operational windfarms within the shipping and navigation study area presented in the CRNRA (Appendix E of Volume 6, Annex 7.1: Navigational risk assessment (APP-098)). It was concluded that all hazards had been reduced to As Low As Reasonably Practicable or Broadly Acceptable (as per section 1.9.8 of Volume 6, Annex 7.1: Navigational risk assessment (APP-098)).</p> <p>Ongoing engagement with vessel operators relating to residual concerns do not relate to navigational safety and therefore would not result in any changes in risk to the Ørsted IPs' developments.</p> <p>With specific reference to the Ørsted IP updated position, which relate more to the cumulative scenario with other proposed Round 4 projects rather than Mona Offshore Wind Project, the NRA and specifically the CRNRA (APP-098) considered the impact on</p>	<p>(Environmental Statement - Volume 2, Chapter 10: Other Sea Users) for existing offshore energy (wind) activities. Specifically, the NRA identifies an impact on allision (contact) risk to vessels which it states to be ALARP, however, the NRA does not address the impact of allision (contact) risk on existing offshore wind farms.</p> <p>Can the Applicant confirm that the changes in allision risk that directly impact the Ørsted IP's assets, especially with respect to West of Duddon Sands and Walney Extension Offshore Wind Farms (as per Figure 56 of APP-098) remain within ALARP parameters, and whether additional mitigations are required for those projects to achieve that ALARP status? The Ørsted IPs do not believe that the Applicant has specifically answered these questions in this SoCG or elsewhere.</p> <p>In connection with the above, and in the interests of safety of navigation within the vicinity of the Ørsted IP's assets, the Ørsted IPs reiterate our position regarding review the VTMP in conjunction with sign-off by the Licensing Authority as a named consultee in this Plan. The Ørsted IPs also expect close co-operation on the Marine Pollution Contingency Plan (MPCP) as part of the OEMP and Emergency Response Co-operation Plan to ensure mutually beneficial outcomes.</p>	

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		<p>navigation safety posed by Mona, Morgan and Morecambe offshore wind farm projects on, amongst other things, Ørsted IPs' assets. For example,</p> <ul style="list-style-type: none"> • Ørsted IPs assets are included in the baseline described in Section 4.2.2. • Rerouting of commercial vessels including ferries described in Section 7.3/7.4 takes into account prudent passage planning around Ørsted IP assets including suitable passing distances. • Collision/allision modelling undertaken in Section 7.7/7.8 includes the effects of concentrations of traffic between Morgan and Walney/WoDS and contact with Ørsted IP assets – with the modelling showing relatively low likelihoods across the entire study area. Figure 55/Figure 56 shows the spatial distribution of the results of this modelling and Table 32 tabulates the return periods across the entire eastern Irish Sea • Section 8 includes the full NRA, hazards identified include collision of vessels between Morgan-Walney as well as allision risks with any WTG (whether Morgan or Ørsted IPs). • NRA hazard workshop stakeholder scoring was undertaken on basis of the presence of the Ørsted IP's assets and their activities, and the NRA results reflect that. The conclusions reached on ALARP are therefore on the basis of the presence of Ørsted IPs assets. <p>The Applicant notes that all matters are agreed with the MCA in its SoCG submitted at Deadline 7 (S_D1_16 F03).</p> <p>The Applicant is committed to continuing the MNEF post-consent and this will include engagement on the relevant shipping and navigation documentation, including the ERCoP, MPCP and VTMP, once</p>		

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		approved by the licencing authority, as set out in OIP.S&N.4 above.		