



Meeting note

Project name	Morgan and Mona Offshore Wind Farms
File reference	EN010124/ EN010134
Status	Final
Author	The Planning Inspectorate
Date	5 April 2022
Meeting with	BP/ EnBW
Venue	Microsoft Teams meeting
Meeting objectives	Projects update meeting
Circulation	All attendees

Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

General Project Updates

BP and EnBW were awarded preferred bidder status on two leases in the Irish Sea as part of the Crown Estate's Offshore Wind Farm (OWF) round 4 leasing, for Mona OWF and Morgan OWF. Mona OWF is the more southerly project, almost wholly within Welsh waters, and Morgan OWF is more northerly, sitting wholly within English waters. The planned development concept is two fixed bottom OWFs each with a capacity of up to 1.5GW. There was uncertainty regarding grid connection and the Applicant was awaiting final outputs from the Holistic Network Design (HND) review, which would set out options for either co-ordinated or radial connections. The outcome of the HND is anticipated to be published in June 2022. Base cases have been identified for both options. All grid connection options presented by National Grid (NG) were broadly in the same geographical areas but the nature and complexity of those connections is uncertain. Scoping boundaries had been identified taking into account the requirement to route around any offshore environmental constraints, such as infrastructure, aggregates and other OWF.

A key constraint for onshore elements were the landfall locations. Geographically separate options had been identified for both Mona and Morgan OWF. The Applicant advised the outcome of the HND review was a decision for NG/ Ofgem. The Applicant would set out the case for consideration of alternatives on the basis of the identification of landfall, onshore and offshore routing, that are within their control. The Applicant was aware of NG's consideration of alternatives for each option and will be looking to get supporting evidence from NG.

The delivery model for grid connection was still outstanding.

EIA Scoping submissions

A request for an EIA Scoping Opinion for Mona OWF was anticipated on 20 April 2022, and Morgan OWF on 26 April 2022, taking a previously discussed staggered approach between the two projects. However, this date is subject to the NG decision and the Applicant is still confirming with relevant stakeholders that there are no confidentiality constraints which prevent submission. The Inspectorate advised it was open to discussing this staggered approach further if it posed difficulties for the Applicant but it was important to consider the impact of two separate scoping requests on consultees, and the need to differentiate between responses for each project.

Scoping would be structured into four parts:

- Part 1 – Introductions, to include methodology, approach to Environmental Impacts Assessments (EIA) and cumulative assessments.
- Part 2 – Generation Assets, to include topics such as climate change, landscapes and seascapes. Cross-referencing would be provided where overlaps occurred.
- Part 3 – Transmission assets, including onshore and offshore assets for the projects.
- Part 4 – Annexes, including transboundary and water framework directive assessments.

The Inspectorate advised the Applicant to be mindful of the size of the document, with file sizes of 50MB or under being easier to access for all parties. The Applicant should also be mindful of GDPR, as the Inspectorate's redaction could increase the file size. If the Applicant intended to submit via a file sharing site a test link should be sent to the Inspectorate in advance of submission to ensure access is possible. The Inspectorate also highlighted [Advice Note 7](#), and the requirement to submit a shapefile at least 10 days in advance of a scoping request. Earlier submission of shapefiles was advisable, if possible, due to the forthcoming Easter holiday period.

Scoping requests were being drafted on single radial grid connections, so any other outcome from the HND review could delay submission. The coordinated option contains the same points of interest as the radial for both projects, but changes could be required due to potential requirements for collaboration.

The Crown Estate's (TCE) plan level Habitats Regulations Assessment (HRA) had not yet concluded. The Applicant had shared scoping timelines with TCE and were confident it had met TCE's requirements.

Update on discussions with Natural Resources Wales (NRW)

The Applicant was in discussion with NRW to determine whether a Marine Licence (ML) for Mona OWFs generation assets could be deemed under the DCO, and to understand how the Deemed Marine Licence (DML) interfaced with the DCO process. Scoping would be on the basis that a ML could be deemed under the DCO for the generation assets for the Mona OWF. The Applicant explained that NRW had encouraged the Applicant to continue with its request for EIA scoping and a full response from NRW would be provided in due course. The draft Scoping Report currently refers to applying for a DML for cable/transmission assets but not generation assets.

NRW have legal authority to defer determination of the adequacy of EIA for a ML to another body (an approach taken for Wylfa Newydd Nuclear Power Station and Awel y Môr OWF (AyM)). This was being discussed with NRW in the context of aligning the ML processes with the DCO decision. The Applicant anticipated a single Environmental Statement (ES) to support both the ML and DCO applications. The Inspectorate advised that if a separate ML was going to be required in place of a DML, the ES would need to be clear on the relevance of information in relation to each process. The

Inspectorate requested an update once NRW had reached its decision and highlighted that NRW would need to satisfy itself that the EIA decision was adequate, the Inspectorate could not go beyond examining the DCO application. The Applicant advised there was a high chance of the array boundary being refined post scoping which could affect the ML requirements.

Update on stakeholder engagement

Engagement with potential host Local Planning Authorities (LPA) based on current points of interest took place between November 2021 and January 2022. LPAs were provided with a high-level explanation of the route selection process to date and wide but indicative plans to facilitate feedback on potential key areas of concern. Feedback was collated but it was noted that several LPAs had not been able to engage (Denbighshire County Council was one of these which is the potential host authority for Mona).

Shipping and navigation is viewed as a potentially significant consenting risk to both projects and a Maritime Navigation Engagement Forum had been set up to look at how best to mitigate those risks. The forum meets frequently, and a road map for managing the process has been shared with the Maritime and Coastguard Agency (MCA) and the Department for Business, Energy and Industrial Strategy (BEIS). There were four different ferry routes/ companies that the projects would interact with, and forum discussions to date include bridge simulations to understand potential safety implications. Meetings had been held with MCA, BEIS, UK Chamber of Shipping and Ferry companies. Consultation was ongoing.

An Evidence Plan Steering Group meeting consisting of NRW, Natural England (NE), the Marine Management Organisation (MMO) and the Joint Nature Conservation Committee (JNCC) had taken place in late 2021, and expert topic groups (ETGs) had been set up as a result of these. ETGs included benthic ecology, fish and shellfish and physical processes, marine mammals and ornithology, and would discuss surveys, assessment processes, methodology and scope. Onshore ecology ETGs would be set up after Easter 2022 to discuss the scope of surveys and data available. The Applicant acknowledged the usefulness of the Inspectorate's engagement in supporting Evidence Plan Steering Groups and ETG.

Next steps

Scoping submission was scheduled for April 2022, following this there would be some offset between the timelines for each project:

- PEIR: Mona OWF in November 2022, Morgan OWF in January 2023
- DCO application submission: Mona OWF in Q4 2023, Morgan OWF in Q1 2024

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The Inspectorate confirmed it was aware of the HND review timelines and explained that the Project Speed initiative is to deal with strategic issues and reduce risks at an earlier stage in the consenting process. These would be considered at a strategic level rather than project level in relation to how projects could be consented in the most efficient way.

The Applicant queried potential outreach for LPAs struggling to engage with the pre-application process. The Inspectorate would check whether LPAs in Wales could bid for additional resources relating to NSIP projects and would consider the impacts of other projects on the capacity of known LPAs.

Both parties agreed a useful structure for future meetings would be a joint meeting with split agendas for each project (45 minutes per project). Any advice issued by the Inspectorate would need to be clear in relation to which project was in question.

The Applicant would contact the Inspectorate to arrange the next meeting once timescales for Scoping and HND review outcomes were more certain.