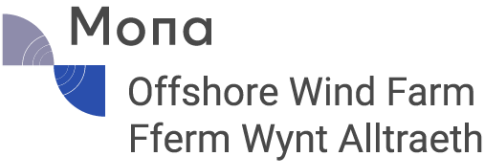


Mona Offshore Wind Farm
Fferm Wynt Alltraeth

Security classification: Public



**RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5
JUNE 2025)**

Latest revision						
Reason for issue	Author	Date	Checker	Date	Approver	Date
Submission to the Secretary of State	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025

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	MOCNS-J3303-JVW-10584		F01

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Revision code	Reason for issue	Author	Date	Checked	Date	Approved	Date
F01	Submission to the Secretary of State	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

Contents

1	RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)	1
1.1	Introduction	1
1.2	Status of commercial negotiations and agreements: Applicant and Isle of Man Steam Packet Company	2
1.2.1	Introduction.....	2
1.2.2	Response	2
1.3	Status of commercial negotiations and agreements: Applicant and Gwynt y Môr OFTO Plc	4
1.3.1	Introduction.....	4
1.3.2	Response	4

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
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 Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.

Acronyms

Acronym	Description
ALARP	As Low As Reasonably Practicable
IoMSPC	Isle of Man Steam Packet Company
NPS EN-3	National Policy Statement for Renewable Energy Infrastructure
PEIR	Preliminary Environmental Information Report
SoS	Secretary of State

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

1 RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

1.1 Introduction

1.1.1.1 On 5 June 2025, the Secretary of State published a letter (the SoS's letter) requesting an update from the Applicant (Mona Offshore Wind Limited) on the status of commercial negotiations and agreements between the Applicant and Isle of Man Steam Packet Company and Gwynt y Môr OFTO Plc. The Applicant's responses to the SoS's letter are provided in the following sections of this document:

- Status of commercial negotiations and agreements: Applicant and Isle of Man Steam Packet Company (Section 1.2)
- Status of commercial negotiations and agreements: Applicant and Gwynt y Môr OFTO Plc (Section 1.3)

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

1.2 Status of commercial negotiations and agreements: Applicant and Isle of Man Steam Packet Company

1.2.1 Introduction

1.2.1.1 Paragraph 3 of the SoS's letter is in relation to the status of commercial negotiations and agreements between the Applicant and the Isle of Man Steam Packet Company (IoMSC) and is set out as follows:

3. The Applicant and Isle of Man Steam Packet Company should provide an update on the status of their Ferry Mitigation Agreement negotiations. If agreement has not been reached, updates should include details of whether an agreement is expected, and if so when agreement is expected.

1.2.2 Response

1.2.2.1 The Parties executed a Non-Disclosure Agreement and are in discussions on the ferry cost mitigation agreement. The draft Heads of Terms for the ferry mitigation agreement are based on an evidence-based recovery of direct losses. These discussions have not yet concluded and remain ongoing. The draft Heads of Terms for the ferry mitigation agreement has been under consideration by the Steam Packet Company's board of directors since November 2024.

1.2.2.2 A summary of key milestones is set out below:

- Draft Heads of Terms were issued by the Applicant on 13 November 2024
- Follow up meetings to discuss the terms took place on 18 December 2024 and 7 January 2025
- The Applicant issued revised Heads of Terms on 11 February 2025

1.2.2.3 The Applicant contacted the IoMSPC on 18 February, 4 March and 2 April 2025 seeking an update. On each occasion the response to the Applicant was that there is no update, and the agreement is still being considered by the IoMSPC board, and that they will contact the Applicant when they have more information.

1.2.2.4 During March 2025, the Applicant also initiated engagement at a senior level within IoMSPC and with the Isle of Man Government, but did not receive any further responses from IoMSPC.

1.2.2.5 Given the lack of meaningful engagement from IoMSPC over the last five months, the Applicant considers that the IoMSPC are not willing to enter into an agreement that is founded on evidence-based direct losses to resolve residual operational effects regarding increased transit distance and associated fuel costs, which are entirely commercial in nature.

1.2.2.6 On 5 June 2025, the Applicant contacted IoMSPC again to request feedback on the previous engagement and received a same day response that they would revert back shortly. The Applicant has received no further correspondence from IoMSPC as of 12 June 2025.

1.2.2.7 The Applicant does not consider an agreement with IoMSPC to be required as it has demonstrated through its assessment that impacts are as low as reasonably practicable (ALARP), and the residual moderate adverse effect concluded for adverse weather routing only, following the substantial reductions made to the Mona Array Area

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

to mitigate potential effects on safety of navigation and minimise route diversions, can be taken into the planning balance.

- 1.2.2.8 Expanding on this point, NPS EN-3 recognises that *“it is inevitable that there will an impact on navigation in and around the area of the site”* (Paragraph 2.8.178). Direct and adverse weather routes of ferries and commercial routes within the eastern Irish Sea are extensive and cover most of the available seaspace. Therefore, there is no location within the eastern Irish Sea where an offshore wind farm could be constructed that would avoid all impacts on lifeline ferries or strategic routes. The Mona Offshore Wind Project has therefore sought to minimise where possible the extent of these impacts in line with NPS EN-3 paragraph 2.8.328. This includes substantial alterations to the Mona Array Area following statutory consultation on the Preliminary Environmental Information Report (PEIR) (Volume 6, Annex 7.1: Navigational Risk Assessment (F6.7.1 F02)) and Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (F1.4 F03)), which have greatly reduced the deviations required for the IoMSPC (and other vessels) to pass around the Mona Array Area. Therefore, the Applicant has acted entirely in accordance with NPS EN-3 to minimise as far as possible impacts on the IoMSPC (and other shipping) routes. The residual deviations should also be considered in the context of the substantial benefits of the Mona Offshore Wind Project on the urgent need for decarbonisation and reduction of greenhouse gases, as set out in the Planning Statement (J2, F02) and the Clean Power 2030 Action Plan.
- 1.2.2.9 Therefore, the Applicant has demonstrated that the application accords with NPS EN-3 paragraphs 2.8.3328 and 2.8.329 and considers that, to the extent there is a residual adverse commercial impact, it is considerably outweighed by the benefits that the Mona Offshore Wind Project affords. The Applicant would, however, welcome continued discussions with IoMSPC post-consent.

RESPONSE TO THE SECRETARY OF STATE CONSULTATION 4 (LETTER DATED 5 JUNE 2025)

1.3 Status of commercial negotiations and agreements: Applicant and Gwynt y Môr OFTO Plc

1.3.1 Introduction

1.3.1.1 Paragraphs 4 of the SoS's letter are in relation to the status of commercial negotiations and agreements between the Applicant and the Isle of Man Steam Packet Company and are set out as follows:

4. The Applicant and Gwynt y Môr OFTO Plc should provide an update on the status of their negotiations. If agreement has not been reached, updates should include details of whether an agreement is expected, and if so when agreement is expected.

1.3.2 Response

1.3.2.1 The Applicant and Gwynt y Môr OFTO Plc have agreed the terms of a commercial agreement. That agreement is currently being signed by the parties and is expected to complete imminently. Once signed, the Applicant expects Gwynt y Môr OFTO plc to withdraw its representations to the application.