

INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION BY MONA OFFSHORE WIND LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MONA OFFSHORE WIND FARM (PROPOSED DEVELOPMENT)

WRITTEN REPRESENTATION ON BEHALF OF AWEL Y MÔR OFFSHORE WIND FARM LIMITED

1. INTRODUCTION

- 1.1. Awel y Môr Offshore Wind Farm Limited (the **Interested Party**) is the developer of the Awel y Môr Offshore Wind Farm project (**AyM**) to be located off the coast of North Wales.
- 1.2. AyM was consented by way of a development consent order made by the Secretary of State for Energy Security and Net Zero on 19 September 2023 (**AyM DCO**), pursuant to which the Interested Party is the undertaker with powers to construct and operate AyM.
- 1.3. AyM is planned to be operational before 2030 and will become Wales' largest renewable energy project.
- 1.4. The Interested Party is also the holder of an electricity generation licence granted by Ofgem on 28 January 2021.
- 1.5. The Interested Party made a relevant representation (examination library reference RR-003) to safeguard its interests and ensure appropriate protections are included in the draft development consent order (**DCO**) (examination library reference PDA-003). Specifically, the Interested Party would object to:-
 - 1.5.1. the Proposed Development being carried out in close proximity (including within) the Order limits of the AyM DCO unless and until suitable protective provisions and any necessary related agreements have been secured to its satisfaction; and
 - 1.5.2. the grant and exercise of powers of compulsory acquisition and temporary possession to carry out the Proposed Development, and any related or ancillary powers, within and in the vicinity of the Order limits of the AyM DCO.

2. INTERACTION BETWEEN THE PROPOSED DEVELOPMENT AND THE AWEL Y MÔR OFFSHORE WIND FARM

- 2.1. The offshore export cable corridor for the Proposed Development crosses the area over which the Interested Party holds an agreement for lease from The Crown Estate.
- 2.2. The Proposed Development will also have other interactions with AyM offshore, including potential construction and operational-related interfaces and impacts.
- 2.3. AyM will connect into the National Grid Bodelwyddan substation, the same grid connection point as the Proposed Development (which will connect into a proposed extension of the same – as described further in 2.4 below). There is an extensive overlap between the land within the AyM DCO Order limits and the Proposed Development, including overlapping works and related compulsory acquisition and temporary possession powers.

- 2.4. Separately, National Grid is progressing a planning application for the extension of Bodelwyddan substation to facilitate the connection of new projects including the Proposed Development. At the time of submission of this representation a planning application for the Bodelwyddan substation extension has not yet been submitted. Although AyM is the furthest advanced of the three projects, it is not possible at this stage to confirm in which order the projects will be constructed (or whether construction of some or all of the projects will happen in parallel) and therefore consideration needs to be given to the mitigation and other measures that would be required in different construction scenarios.
- 2.5. The Awel y Môr onshore cable route and connection into Bodelwyddan substation is shown on sheet 11 of the certified AyM Works Plan and sheet 10 of the certified AyM Land Plan (Onshore), copies of which have been enclosed with this representation as Appendices 1 and 2.
- 2.6. Work Nos. 25 (part of the onshore cable corridor) and 26 (electrical connection works) forming part of the Proposed Development and shown on the Works Plan – Onshore (examination library reference: AS-003) and described in the draft DCO (examination library reference: PDA-003) overlap extensively with Work Nos. 36 (part of the onshore cable corridor), 39 (construction haul road), 39A (temporary construction compound (TCC) and laydown area) and 40 (electrical connection works) as authorised by the AyM DCO.
- 2.7. In addition, Work Nos. 30 and 38 (permanent access) forming part of the Proposed Development overlap with Work Nos. 39 and 41 (operational accesses) as authorised by the AyM DCO.
- 2.8. The extent of overlap between the Proposed Development and AyM in the vicinity of the National Grid Bodelwyddan substation is shown on the plan which the Interested Party understands is to be referred to as '*D1_5.7_Mona_OWF and Awel y Mor OWF Works Plans Overlays*'. This plan has been produced by the Applicant in consultation with the Interested Party for submission at deadline 1 in response to hearing action point 15 following issue specific hearing 2 (ISH2).
- 2.9. Work No. 25 of the Proposed Development includes the installation of cables and a TCC. As was highlighted in the Interested Party's statutory consultation response to the Proposed Development dated 26th May 2023, any proposals to locate a TCC or cables within the AyM DCO boundary and/or above the installed 400kV export cable of AyM require further detailed consideration.
- 2.10. In particular, the Interested Party seeks an assurance from the Applicant that it will use its best endeavours to avoid crossing the AyM 400kV export cable. In this regard, and as submitted on behalf of the Interested Party during ISH2, Figure 1.12 in the Onshore Crossing Schedule (examination library reference: APP-083) indicates that provision has been made for two crossings (one trenched, one trenchless) in the northern area of Work Nos. 25 and 26 and parallel to the National Grid Bodelwyddan substation.
- 2.11. The Interested Party raised the omission of the prospective location of the AyM 400kV export cable from the crossing schedule during ISH2 and understands the Applicant's position to be that the crossing schedule only describes existing features. This is of particular concern to the Interested Party as the crossings described in 2.10 above are proposed in the likely vicinity (at the time of writing) of the AyM 400kV export cable. Although detailed design of the AyM 400kV cable corridor has not yet been completed, the Interested Party and the Applicant, together with National Grid and other third parties connecting into the National Grid Bodelwyddan substation, have met regularly to discuss the interaction of their respective projects and the Interested Party's likely cable route is known by the Applicant.

- 2.12. The Interested Party would therefore seek further clarity from the Applicant as to its assumed onshore cable route and grid connection location and a commitment to use best endeavours to avoid crossing the AyM 400kV export cable. The Interested Party would wish to highlight that in designing its works and in engagement with the Applicant and National Grid, it has sought to avoid the need for a crossing of the Proposed Development and to leave the Applicant sufficient space to construct its export cable and grid connection without crossing the Interested Party's proposed export cable route.
- 2.13. In the event that both wind farm projects are carrying out construction works in the vicinity of the Bodelwyddan substation, and the Interested Party is still using a construction haul road which interacts with the corridor of the export cables forming part of the Proposed Development, the Interested Party seeks a commitment from the Applicant that in those circumstances the Applicant would employ trenchless crossing techniques to cross the AyM haul road so as not to interrupt or impede AyM construction works.

3. PROTECTIVE PROVISIONS

- 3.1. In the light of the interactions and overlaps described in section 2 above, it will be necessary for the DCO for the Proposed Development to include protective provisions for the benefit of AyM. The draft DCO as submitted does not include any such bespoke protective provisions.
- 3.2. The Interested Party provided a set of protective provisions to the Applicant on 3 July 2024 for comment and awaits its response.
- 3.3. In the event that it is not possible to reach agreement with the Applicant, the Interested Party would reserve its right to request and attend a compulsory acquisition hearing or issue specific hearing to make submissions to the examining authority on the required form of the protective provisions and any necessary amendments to the draft DCO. If it becomes necessary to attend one or more hearings the Interested Party reserves its right to provide further written material in support of any matters remaining in dispute between the parties at that stage.

Awel y Môr Offshore Wind Farm Limited
7 August 2024

Appendices (submitted separately)

Appendix 1: Extract from Awel y Môr Works Plan (Sheet 11)

Appendix 2: Extract from Awel y Môr Land Plan (Onshore) (Sheet 10)