

**Busnes a Rhanbarthau - Gogledd Cymru  
Grŵp yr Economi, Egni a Thrafnidiaeth**

**Business and Regions - North Wales  
Economy, Energy and Transport Group**



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**Llywodraeth Cymru  
Welsh Government**

Sent to: [MonaOffshoreWindProject@planninginspectorate.gov.uk](mailto:MonaOffshoreWindProject@planninginspectorate.gov.uk)

07 August 2024

Dear Inspectors

**Re: Mona Offshore Wind Farm - Welsh Government Response  
(Interested Party Reference Number: 20048195)**

Thank you for the opportunity to participate in the Mona offshore wind examination process. This response from Welsh Government is made on a without prejudice basis.

Mona represents an opportunity to take Wales closer to meet its decarbonisation targets and as a result will contribute towards the renewable energy targets for Wales. As Wales hosts this significant infrastructure, it seeks to ensure maximum benefit from them as well. It presents both benefits and risks across the region and Wales.

We recognise the project could be a catalyst to secure long-lasting legacy benefits for North Wales and indeed Wales and the key to securing such a legacy will be coordinated action and strategic approaches by both the public and private sectors, ensuring that the mitigation measures protect the Welsh public purse from additional costs.

Welsh Government believes it can support the joint venture as well as all other proposed significant development across the north Wales region to ensure the benefits are maximised as a package and ensuring effective engagement with the significant projects is essential for this to happen. Wales realises its role not only in meeting our targets here in Wales but also supporting the UK in ensuring a secure and reliable from of energy. However, to host such significant infrastructure Wales also expects those opportunities which can be secured in Wales to be located in Wales. These include the usage of ports, the provision of skills and providing opportunities for communities to benefit from these opportunities. The North Wales region is positioned to support the delivery of such opportunities and wish to ensure this project, with other significant infrastructure, works with Welsh Government and key partners to secure economic, social and environmental benefits.

We recognise the importance of ensuring a strong working relationship with the joint venture, Offshore Energy Alliance and local planning authorities. We understand that certain policy areas have been part of the topic specific areas to date. This response is framed to provide you with a cross-government view.

## **Overview**

This response has been prepared on the basis of feedback from across several Ministerial portfolios within Welsh Government. Further detailed comments from Welsh Government's Cadw colleagues is attached at appendix A.

The Well-being of Future Generations (Wales) Act 2015 came into force in April 2016. The Act sets out 7 core Well-being Goals and Principles to provide a clear framework for government and the wider public service to ensure that future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities. This response seeks to consider these well-being goals.

It is noted that reference to Planning Policy Wales edition 11 is made in the evidence documents. This has been superseded by [Planning Policy Wales edition 12](#) and clarification is required to ensure the project is in line with the updated policy especially in terms of revised Chapter 6.

In economic policy terms, the Economic Mission (2023) sets out the Welsh Government's four priority areas to focus and deliver against the ambitious outcomes – these being:

1. A just transition and green prosperity
2. A platform for young people, fair work, skills and success
3. Stronger partnerships for stronger regions and the everyday economy
4. Investing for growth

Our overarching policy on reducing carbon emissions and achieving net zero status by 2050 is captured in Net Zero Wales Carbon Budget 2 – a document which represented a new phase in our decarbonisation journey and net zero target. This Plan set out 123 policies and proposals, alongside commitments and action from every corner of Wales.

## **Alignment with national priorities**

The Environment Act, working in tandem with the Well-Being and Future Generations Act, provides a robust legislative framework to ensure we accelerate action in relation to Climate Change.

Welsh Government has an expectation that all new renewable energy projects should include an element of local ownership. Welsh Government urges Mona to make every effort to ensure the project can meet this expectation by engaging with local communities and grassroots organisations. We would also expect the community benefits element of the project to be aligned as closely as possible with existing Welsh Government programmes with a view to ensuring maximum benefit in terms of key outcomes such as tackling poverty, decarbonisation, Cymraeg 2050 and future skills.

A number of similar community benefits schemes are currently being developed around Wales in relation to major infrastructure projects and would recommend that bp/EnBW identifies, and adopts, best practice. In addition, we would like to explore how this project could enable a lasting legacy for Welsh communities through the creation of a regional endowment fund. However, we understand that some elements of community benefits might fall outside the planning process, as only direct mitigation will be considered as part of the DCO process. A regional discussion on this would be strongly encouraged to share learning and experience as these go forward.

Welsh Government would encourage discussions to ensure a strategic approach is taken and would support future Community Benefits strategy. It would be valuable for the Mona project to adopt the Welsh Government's Community Benefits Measurement Tool, allowing for clear demonstration of the benefits realised. Officials would be available to provide more information and/or training on its use.

Net Zero Wales sets a tree planting target of 43,000 hectares of new woodland by 2030, and 180,000 hectares by 2050, to meet the 'balanced pathway' set out by the UK Climate Change Commission. The development of a National Forest for Wales, a Programme for Government commitment, will include both new areas of woodland and help restore and maintain some of Wales's irreplaceable ancient woodlands, providing a network of accessible woodlands with community involvement. The evidence submitted should identify how this has been taken into account. Careful consideration is needed to ensure that new tree and hedge planting is designed to be appropriate to the site and landscape and considers other site sensitivities such as habitat and species presence.

The onshore development runs close to the boundaries of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). There is an aspiration by the Welsh Government to designate a new National Park in north-east Wales. This is subject to Natural Resources Wales carrying out the statutory designation process, part of which will be to examine where the boundaries of any new Park should lie. While National Parks and AONBs enjoy similar protections in terms of major developments, there is a possibility that the boundary of a new National park may not coincide with the current AONB (which would be de-designated). There may be future implications of the designation on the onshore development linked to Mona.

There is not a biodiversity metric tool for assessing net benefit in Wales. We do not have an established policy for the delivery or assessment of marine net gain. However, applications would be expected to have taken into consideration policies laid out in the Welsh National Marine Plan such as the protection, restoration and / or enhancement of marine ecosystems (as in ENV01) as part of the development. We would have expected the advice from Natural Resources Wales (NRW), as our Statutory Nature Conservation Body, to have been taken into regard as part the application process.

The Welsh Government's WNMP Implementation Guidance provides some examples of restoration and enhancement that could be considered and instructs marine plan users to engage with NRW for advice. NRW have developed and published a guidance note, 'GN 059 Principles supporting restoration and enhancement in marine or coastal development proposal' which sets out the approach to advising on inclusion of restoration or enhancement elements in a marine or coastal development proposal' to

set out their approach to advising on inclusion of restoration or enhancement elements in a marine or coastal development proposal, as part of their remit to provide advice (statutory and non-statutory) on how developments might affect the Welsh marine environment.

We expect all developments in Welsh waters to have regard for the Welsh National Marine Plan including in ENV01 (Resilient marine ecosystems) and ENV02 (Marine Protected Areas). It is further expected that developers will consider opportunities to ensure the protection, restoration and / or enhancement of marine ecosystems (ENV01) in the marine environment as part of their proposal, above and beyond mitigation and/or compensation as deemed necessary.

## **Housing**

The effect of the workers housing policy on the local communities will vary from community to community and depending on the workers profile. The effects on the Welsh language and culture will also vary from one community to another. We welcome the Community and Linguistics Impact Assessment which has been prepared and highlights the possible impacts on the Welsh language. There will be a need to continue to assess the impact as the development progresses as well as the need to cross reference between the housing strategy and the Welsh Language Impact Assessment in order to identify and ensure mitigation measures where necessary, that will reduce any negative effects on the Welsh language and culture in the communities affected and reduce additional pressure on the housing stock within communities.

## **Skills and workforce**

It is the responsibility of the Welsh Government, along with key stakeholders such as the North Wales Regional Skills Partnership, Medr (the Commission for Tertiary Education and Research, which will be a new arm's length body responsible for funding and overseeing post-16 education and research in Wales from August 2024), along with Further and Higher Education organisations, to ensure that local people are best placed for employment, ensuring local career opportunities, fairly-paid employment and vibrant sustainable economies and communities. In order to do this, the Welsh Government has been fully committed in supporting the developments for the offshore wind industry and working with the industry to understand what support is required in north Wales and how we can work together to provide the best outcomes.

The Outline Skills and Employment Plan (Reference Number: MOCNS-J3303-RPS-10160, Document Reference: J24) provides a good basis and framework to help provide an opportunity for further engagement and collaboration with Welsh Government and Partners – the initial assessment of the current workforce and analysis of the Regional Skills Partnership - NW Employment Plan is to be welcomed. Greater detail on the potential of expanding existing skill-based activities would be welcomed and include such detail in the Skills Employment Plan. For example, whether there is intention to work with Coleg Llandrillo on expanding the opportunities offered at the college, and if there is an opportunity to collaborate with other Offshore Wind developers to consider jointly-commissioned provision in terms of courses and use of specialist facilities. The Universities across the region at Bangor and Wrexham

already provide exceptional opportunities to support the industry and are ready to work with the industry to further those opportunities.

The Regional Skills Partnership has for example commissioned reports on North Wales Low Carbon Energy Skills Partnership. It would be useful to understand how the developer has engaged with the RSP to influence the content of J24. The RSP has also commissioned a prospectus for businesses and for those with an interest in relevant skills. Again, it would be useful to understand the discussions which have taken place in the region on the opportunities which already exist and what gaps might need to be considered further.

The outline Objectives and commitments information is also useful in providing a high-level plan of proposed action and activities – there will need to be careful consideration to identify if these are reflective of need/align with national and regional priorities. We therefore believe it's critical that the joint venture works closely with the Regional Skills Partnership, Welsh Government and local skills providers whilst delivering its community needs analysis and opportunities to work closely on the related community engagement they plan to undertake.

Additionally:

- We clearly recognise the potential Mona has to create high value jobs and improve local skills so that young people can continue to live or return to their local communities. Therefore, further evidence on your assertion to what proportion of the workforce is likely to be local would be useful.
- Given the scale of the workforce required and the potential impact that this will have on the wider North Wales economy, further clarification is required on the skills requirements and the associated training plans. The Welsh Government and the Regional Skills Partnership are looking forward to continuing to work with the joint venture and other stakeholders to developing future opportunities.
- Consideration would need to be given to such issues as the displacement of existing skills and the ancillary workforce required – how many will these be and how will these effects be mitigated/ minimised.

It is anticipated that 87 individuals will be relocated to the area, and once a clearer picture of the actual number of workers moving into the area is available consideration will need to be given to whether the project will affect the numbers of children going to school in the area and consideration to be given to the Welsh language. This could have an impact on local authorities' targets within their Welsh in Education Strategic Plan as well as increased pressure on Welsh language immersion centres.

## **Welsh Language**

The Welsh language strategy, Cymraeg 2050: a million Welsh speakers (2017), highlights the possible impacts large structural developments can have on the Welsh language. The area of development is located within an area of linguistic significance and therefore vital that the proposed development aligns with the aims of Cymraeg

2050 and proactively supports the long-term sustainability of the language in its traditional heartlands.

Detailed evidence by means of Welsh Language Impact Assessment is necessary, we therefore welcome the Community and Linguistics Impact Assessment report. We recommend that the Impact Assessment is assessed by an experienced language planning practitioner to ensure that the potential impacts of the development on the language are fully understood. The Community and Linguistic Impact Assessments should be reviewed on a regular basis and cross referenced with other relevant impact assessments and policies.

The Welsh Language Commissioner is available to provide advice and assistance and should therefore be a valuable stakeholder. Local Welsh language groups such as the mentrau iaith are available to help create a strong evidence base. This engagement should facilitate a more focussed and strategic approach to any mitigations put forward relating to the Welsh language.

Outward migration of young people, especially Welsh-speakers, is a challenge to the sustainability of Welsh-speaking communities. Planning a workforce that can enable young people to be best placed with the necessary skills and knowledge would be a priority to safeguard the Welsh language as a thriving community language. This will also help reduce the number of people leaving the area seeking job opportunities outside of the region.

The Welsh language is widely used in the region and is the main language in many communities. As a result it is necessary that any community benefit schemes should actively encourage and support the use of the Welsh language.

## **Transport**

Promoting sustainable forms of travel is to be encouraged including detail on how the workforce will travel in a sustainable manner and on the design and location of provision, as well as logistical movements during construction. The joint venture is encouraged to discuss such opportunities with Transport for Wales and local authorities in terms of walking and cycling. When providing the evidence in relation to transporting parts relating to the project, it would be useful to understand what sustainable options have been considered and how these could push us towards zero carbon. Detail on whether rail freight, for example, has been considered would also be useful to minimise impact on the highways in the region.

We would welcome the opportunity to discuss any opportunity of installing additional telecom ducting within highways during the project as well as understanding bp / EnBW's ICT needs to monitor impacts in the future, linking with existing infrastructure in the area.

We would also like to make the applicant aware of recommendations by the Emergency Medical Retrieval and Transfer Service (EMRTS) to move services which have been approved by the NHS Wales Joint Commissioning Committee (JCC). The exact location of the base will be decided later, but the service will be moved from

Caernarfon airport to a more central north Wales location, alongside the A55. The new service is expected to start in 2026.

## **Port and Supply Chain**

Welsh Government is fully supportive of the joint venture's desire to maximise the benefits for business in the UK through the aspiration to spend 60% of their investment in the local (UK) supply chain and this will have to be included if applying for Contract for Difference. Welsh Government would welcome any insight into these opportunities during the course of examination.

Welsh Government would expect that a significant proportion of this investment will be in Wales and that companies identified within the Advanced Manufacturing, ICT, Construction and Engineering sectors will be given opportunities to compete for contracts within the project's various tiers. We aim to create a lasting legacy of competent businesses capable of becoming part of the global supply chain, exporting goods and services.

We are therefore eager to work with the joint venture to identify ways of improving the estimated economic value to the region and wider economic benefits that could flow from the significant export market that has been identified in the recently published Offshore Wind – Industrial Growth Plan. The current estimates noted in the assessment, whilst welcomed, could be seen to be low/modest given that total value of the investment envelope across the lifetime of development. However, we recognise that bringing forward such opportunities is dependent on critical port infrastructure and understand that assessment on which port(s) can be used in the development is still being taken forward. We do however believe that Welsh Government can and should play a role in making port facilities/associated development possible to accommodate a large part of the joint venture needs (reflecting strategic ambitions noted below).

With the objective of trying to enhance the overall opportunity in mind, early engagement and enabling the flow of demand-led intelligence will be important in helping to deliver this outcome. Welsh Government has the necessary support mechanisms available for companies identified to offer bespoke and conventional solutions to develop their capability and capacity. We are also happy to be party to and facilitate the opportunity to work closely with cross border regions and UK Government to seek wider investment opportunities that provide real strategic benefits that could be realised in ports and associated development. Working on this together will be an important priority in developing Wales's industry for the renewable energy market.

Welsh Government along the North Wales Economic Ambition Board and the Offshore Energy Alliance would be looking to also work closely with the joint venture to maximise the opportunities available for local and regional supply content. This would involve cluster development that will look to local services such as food and critical land/agricultural services maintenance on a local level. We fully support the co-orientated approach taken between bp/EnBW and RWE to deliver an event at Llandudno for supply chains and these needs to continue at regular intervals to allow the supply chains to also fully understand and participate in the delivery of these significant offshore wind projects.

To build on the cluster ambition Welsh Government, in conjunction with the Offshore Energy Alliance, have independently commissioned a report to analyse the pipeline of offshore developments and supply chain capacity/capability in north Wales. The report presented a number of recommendations to help improve the supply chain context in north Wales – helping to increase investment, productivity and competitiveness, which will result in positive economic development in the region. We look forward to working closely with the developers to address and realise some of the key recommendations and how they can achieve an effective cluster.

The report also identifies key strategic opportunities that could seek to provide direct improved supply chain, Operation and Maintenance (O&M) capability, building on some of the strengths that are already present in the north Wales region and beyond. We believe that close engagement could provide joint benefits.

These elements, support our supply chain development as a key priority in developing as lasting legacy for Welsh Government and focused engagement on identifying the programme of activity including timelines and specific company requirements will be crucial. We look forward to working with the joint venture to formulate a full delivery and engagement programme for the duration of Mona and its decommissioning.

The Welsh Government has committed to support ports across Wales.

On 10 March 2021 the Welsh Government launched Llwybr Newydd: the Wales Transport Strategy (WTS) 2021 that will shape our transport system in Wales over the next 20 years.

Within the WTS the Welsh Government has set out its Ports and maritime transport Priorities over the next five years which will include:

- investing in projects that deliver more sustainable ports infrastructure and which contribute to decarbonisation in the sector;
- working with ports in Wales to identify opportunities for future economic development such as offshore renewable energy and innovations in decarbonisation.
- the potential benefits from both floating offshore wind (FLOW) and fixed offshore wind (Fixed OW) energy are significant, including low-carbon energy generation, jobs and wider economic activity over the next two decades and beyond.
- Welsh Government is keen to continue working with the joint venture to ensure the north Wales ports benefit from this proposed project and will continue to work with Mona to bring opportunities to fruition.

## **Health and Public Services**

The scoping exercise has identified some areas which might potentially be affected. There is a need to ensure that details on the effects of local health services are



considered when more specific evidence is released, including any issues of safety that need to be considered to those members of the public living close to the site for when grid comes to land.

## **Woodlands and Trees**

There is a strong presumption against the permanent removal of woodland as set out in “Woodlands for Wales, Welsh Government’s 50yr strategy for woodlands and trees in Wales”. There is also an expectation for compensatory planting for trees lost to development, as set out in Planning Policy Wales (edition 12). Individual trees such as hedgerow trees or ancient/veteran trees are distinctive features in the landscape and provide breeding sites, food and shelter for many species.

A number of documents set out the presence of woodlands, trees and groups of trees, and hedgerows that will/may be affected by the proposed development. Overall, there has been a conscious effort to avoid impacting woodland and ancient or protected trees and this is appreciated. Points relating to the most relevant documents are:

### Tree Survey and Arboricultural Impact Assessment Part 1 (Doc Ref 7.66 or APP160)

This states at page 4 in response to Woodland Trust, that

- “Ancient Woodland, veteran trees and their root protection areas (RPA) have been avoided by the direct impacts of the Onshore Cable Corridor and Onshore Substation”.
- “The operation and maintenance of the Onshore Substation and Onshore Cable Corridor should not necessitate the removal of trees or encroachment on any tree RPAs.”

However, paras 1.9.3-1.9.5 set out that trees *will* be removed as a result of this development. This raises questions as to the validity of the above statements.

While a loss of “less than 55 trees” is quoted at para 1.9.5, there is

- No indication of whether any of these are ancient or veteran trees (not clear whether the original statement to the Woodland Trust still stands).
- No acknowledgement that some of the trees lost form part of woodland (W2) in proximity to the substation development (Annex C Part 8 refers), or form part of any other woodland.
- No acknowledgement that Woodland W2 currently connects two ancient woodland sites (Tree and Hedgerow plan ref B14 or APP 019 – Sheet 11) and the proposed loss of trees will essentially sever this link.
- No statement of total woodland area lost either at W2 or for the overall development proposal, or total amount of hedges to be removed, whether standard hedges or “important” hedges.

- No further mention/detail of the impact on the Llanddulas Limestone and Gwyrch Castle Wood Site of Special Scientific Interest (SSSI) mentioned at p.4 of the doc.

This information is also lacking at all of the relevant Appendices A, B and C. These points are important considerations in assessing the impact of the proposal on trees and woodland and need to be addressed both in terms of their impact and how their impact might be avoided, reduced or mitigated.

Overall, it makes it very difficult to assess whether the replanting/replacement proposals of both hedges and trees in the Outline Landscape and Ecological Management Plan (Doc Ref J22 or APP 208) at Table 1.6 will actually replace what is being removed, which should be a minimum. This needs to be addressed and made clear.

Planning Policy Wales 12 Chapter 6 was updated in February 2024. This enhanced existing policy to protect all woodlands and trees with an expectation for compensatory planting. It also provided further clarity on securing net benefit for biodiversity through the application of a step-wise approach including the need to consider enhancement and long-term management at each step. Protections for trees and woodlands were also aligned with this. It is recommended that future more detailed documentation around managing the impact of the development on trees/woodlands/hedgerows and wider biodiversity in the area, are aligned to the approach set out in PPW 12.

#### Outline Landscape and Ecology Management Plan (Ref J22 or APP208)

As above, there is a lack of transparent data on the amount of woodland and hedgerow that is being removed in relation to what is to be planted/established. This needs addressing.

The aim of establishing native broadleaved trees and woodland to replace that which is lost is welcome. All tree species selected should be suited to site conditions. New plantings should be maintained for 12 yrs, with weed control to reduce competition and replacement of dead trees. This is a standard maintenance condition that is attached to Welsh Government woodland creation grant schemes.

Although not yet stated, planting density for new woodland should be at 2500 plants/ha and hedgerow or individual trees removed should be replaced at a ratio of 3 young trees for every tree removed. This is to ensure that adequate numbers reach maturity to maintain the feature in the landscape. Ground preparation for planting should be minimised to ensure establishment while avoiding carbon loss from soil. The Woodland Carbon Code provides guidance on this.

Para 1.8.2.10 states that larger woodland areas would only have the protection of livestock fencing with individual tree shelters limited to smaller groups of trees. In addition to livestock and deer, all young, planted trees also require protection against rabbits and voles in order to establish successfully. Tree shelters for all broadleaved trees planted should be used. This will provide this protection as well as ease follow-up weed control in future years. Tree shelters will require adequate support and maintenance to ensure they remain in place and functional.

### Outline Arboricultural Method Statement Doc (J26.18 or APP 230)

It is appreciated that detailed arboricultural method statement will be developed at a later point. Comments as follows:

Root Protection Areas (RPAs) - These are defined as being calculated as 12 x the diameter of the tree. Table 1.1 sets out values for quick reference, putting a limit on these areas in reference to larger trees at 12m or 1m tree diameter. Mature trees particularly ancient and veteran trees can have a greater diameter than this, which should be reflected in the size of the RPA. Therefore, the cap on the RPA should be removed in order to be reflective of the size of each tree impacted and detail on how the roots are protected at various points along the roots as some areas are more sensitive than others.

Dust management - The proposal outlines that a hose will be used to hose down trees where the dust accumulation on leaves has built up, which seems a singular approach. A more practical solution would be to manage the dust on the site, with water bowsers in place to damp down bare soil and reduce dust. This practice has been employed in coal, sand and gravel quarries, as well as other construction sites. It is not clear why this has not been proposed here, as it would benefit other forms of vegetation affected by dust as well as trees.

Soil compaction and compressed air aeration - This method of tackling soil compaction around roots has been tried in urban areas and with limited success, particularly if compaction goes deeper into the subsoil. The best option is to avoid compaction of tree roots in the first place, with RPAs excluding machinery and where unavoidable, low pressure equipment, good weather operating conditions.

General point

APP 161 - Annex 6.6: Tree survey and arboricultural impact assessment Part 2 - Appendix A – lists all trees, woodlands, groups of trees and hedges affected by the development. There may be some duplication – pages 15-19 look very similar to pages 20-31.

### **Best and Most Versatile (BMV) agricultural land and soils**

1. Agricultural Land Classification (ALC) – Technical Assessment and Advice.

An Agricultural Land Classification (ALC) field survey has been conducted of the proposed substation site and representative areas of agricultural land along sections of the proposed cabler corridor. The findings are presented in Environmental Statement Volume 7, Appendix 7.2, with key background climatic information, geology and published soil information separately in Appendix 7.1

Welsh Government has undertaken a desk-based validation of the ALC report in accordance with the 'Revised Guidelines and Criteria for Grading the Quality of Agricultural Land' (MAFF 1988) (referred to as 'the Guidelines' below).

As presented, the Department is unable to fully validate the report findings, and requests the applicant and ALC surveyor provides additional information to justify the grading.

The issues to be addressed are as follows:

- i. Droughtiness – it is unclear if soil droughtiness has been considered for the site which is a concern due to a number of shallow and stony profiles noted. No evidence is provided of drought calculations undertaken and if limiting. The report should be amended to address this.
- ii. Stoniness – the assessment has not spilt the stone fraction in all observations to the size limits as described in Table 5 of the Guidelines (stones larger than 2cm and stone larger than 6cm).
- iii. Soil Colour – for the auger borings, soil colours are not described using Munsell soil colour charts.
- iv. Gleyed Horizons and Slowly Permeable Layers (SPL) – in the auger boring schedule, it is difficult to determine the presence of a gleyed horizon and/or a SPL. The auger boring schedule and pit profiles should be amended to address this and include the Wetness Class (WC) determined for all observations. Also for SPL, the report does not evidence soil porosity observed.
- v. Auger boring log – it is unclear what the limiting factor is to grading in a number of profiles examined (e.g. soil depth, wetness & workability, etc.). This should be clarified.
- vi. Site and Standalone Limitations – the reports does not evidence consideration of a number of standalone limitations, for example gradients, microrelief and agricultural flood risk.
- vii. Reasons for grading have not been clearly described.
- viii. Photographs – the department would welcome, if available, photographs of the soil pits examined.

Welsh Government would welcome clarification and discussion on the above points as soon as possible from the surveyor and applicant. From this, relevant officials from Welsh Government would review the report again for validation.

As per Welsh [Government published guidance](#), if a survey is not accepted by the Welsh Government, the Predictive Map Grade should be accepted by the determining authority as the best available information.

## 2. Site Selection (AS-016 – ES Vol 1 Chapter 4 – Site Selection and Alternatives).

It is welcome that BMV policy (PPW para 3.58 and 3.59) and agricultural land quality information (via the Predictive ALC Map) was considered at an early stage in the site selection process, for both the substations and refinement of the onshore cable route.

## 3. Land Use – (APP-070 – ES Vol 3 – Chapter 7 – Land Use and Recreation).

The applicants have considered published soil and land quality information early in the assessment process. It is welcome that impacts to BMV and other soil functions and services are considered, and that the applicant has submitted an Outline Soil Management Plan (oSMP). See additional comments on oSMP below.

Under Section 7.4.1 the Welsh Government considers that the Predictive Map Guidance Note is also relevant guidance to be considered for the assessment. Under Table 7.11, the applicant has not listed previous ALC field surveys in the desktop assessment. Previous surveys have been considered in Fig 1.2 of APP-0168 – ES Volume 7, Annex 7.1.

Welsh Government disagrees with the sensitivity criteria noted for agricultural land in Table 7.20. The IEMA Guidance (A New Perspective on Land and Soil in EIA - February 2022) notes in Section 9, Table 2 that in all BMV in Wales is considered 'Very High' sensitivity (i.e. ALC Grade 1, 2 and 3a). Therefore, it is considered the assessment for impacts for agricultural land and soil functions should be reviewed in line with Section 9 of the IEMA guidance.

Welsh Government does not agree with the section 7.5.2.6, regarding a significant adverse effect on BMV would only occur on a loss of 20ha or more. This is purely the consultation threshold with Welsh Government and any loss of BMV, as a finite resource, needs to be considered as per PPW paragraph 3.58 and 3.59.

#### 4. Outline Soil Management Plan.

It is welcome that an outline Soil Management Plan (oSMP) has been prepared and submitted by the applicant.

It is appreciated that only initial ALC survey work and soil physical characteristics assessment have been undertaken for representative areas of the cable corridor to date. It is welcome that further ALC survey work is proposed pre-construction to inform the final SMP. A firm commitment by the applicant to undertake this work is necessary.

It would be welcome if the oSMP included more detail on the soil handling methods proposed for stripping, storage and placement of soils. It is considered that Sheets A to E of the 'Good Practice Guide for Handling Soils in Mineral Workings' (2021) by the Institute of Quarrying (IoQ) are most appropriate to avoid issues such as soil compaction.

It is noted that the on-shore cables will be installed in cement bound sand. It is unclear what use will be made of the excess soil and how this will be sustainably reused. Further information would be welcome.

#### **Funding opportunities from procurement**

In addition to the community benefits mentioned above, from a procurement perspective, the Mona project could create significant opportunities.

Although procurement carried out by you may not be subject to EU Regulations, the principles of the Wales Procurement Policy Statement framework could be adopted, supporting the ambitions of the Welsh Government in relation to procurement.

## **Grid in Wales**

The Welsh Government's preferred position (PPW para 5.7.9) on new power lines is that, where possible, they should be laid underground. However, it is recognised that a balanced view must be taken against costs which could render otherwise acceptable projects unviable. Where undergrounding of lines is not possible or applicable, proactive engagement with energy companies and the public to mitigate the visual impact of any potential new transmission lines should take place.

## **Hydrogen**

Welsh Government would also be interested in understanding how this project might contribute to a multi-vector energy opportunity across north Wales. There is considerable discussion on hydrogen across the north Wales region currently and it would be useful to understand how this project might contribute to those opportunities.

## **Circular Economy and Decommissioning**

Beyond Recycling – The Circular Economy Wales strategy's aim is to keep resource in use for as long as possible and find these resources new uses at the end of their first useful life. And we expect producers/developers to reduce waste at the end of life of an installation, including reusing as much as possible, and then recycling what cannot be prevented or reused.

We would wish to see bp/EnBW develop a decommissioning plan from the outset with the waste hierarchy followed. This ambition is supported by general policy in Planning Policy Wales. Which empathises the need to make sustainable resource choices and to promote the principals of a circular economy when proposing a development. The potential for designing out waste should be considered at an early stage when formulating proposals and should include using materials and products which are or can be deconstructed and reused, refurbished, remanufactured or disassembled and recycled.

## **Impact Mitigation**

Although the Welsh Government understands the specific scope of this application, the impact on a small community will be significant and therefore would wish to raise this as a concern. This area, due to a number of significant projects, is facing piecemeal approach to the grid infrastructure which will cumulatively have a significant impact. These were highlighted at the initial examination hearing sessions.

The impact of all these will mean several sub-stations and the doubling in size of a national grid transmission station. The community is only hosting this infrastructure and it could be argued are benefiting very little from the generation and its point of use. It is understandable that the National Grid development is not part of this DCO as it is accommodating more than this project, however, understanding the impact of such an

extension would be useful for communities to see the full impact and how the landscape mitigation will protect this community in future from the significant structures and potential noise. For the benefit of the community it would be useful if all the project developers would offer some form of plan to minimise the effects of these buildings on the small community. This goes beyond 'community benefits' discussion which would sit outside the DCO process. A piece of strategic planning for this area could be of benefit. See also related comments on grid.

Although only those mitigations directly linked to the application will be considered as part of this process, the Welsh Government would like to highlight its policy in terms of local ownership. Clearly the process for leasing sites for offshore wind does not allow the community ownership guidance to be followed. However, some detail on how the community benefit package will be supporting local communities would be welcomed. Welsh Government, along with other key partners in the region, are ready to work with the project developers on such issues.

### **In combination effects and considerations**

Welsh Government fully recognises the impacts that this development will have on the communities within immediate proximity to site where the cable will come to shore and across areas of the coast as well as views from inland.

Further consideration needs to be made and evidenced on how Mona impacts will be managed within the context of other possible developments in the region. It would be useful if the developers of both Mona and Awel y Mor were to continue to work together on ensuring a detail timetable to ensure communities are aware of what is happening where and why and by whom. Any opportunities to minimise the impact on local communities should be taken forward even if it meant carrying out certain work not in the intended order. It would be useful to understand how the Mona project has and is working with Awel Y Mor to minimise effects on local communities. We understand there were some initial discussions with RWE, the Mares connect project and National Grid Electricity Transmission, but unfortunately it seems that this did not lead to a more holistic strategic approach for this area.

Welsh Government officials were involved in the Offshore Transmission Network Review and had raised the issue that Awel y Mor would fall outside the remits of the review and that at least two other projects would require connection to the GB transmission system in this area. It is noted that this limits the ability of this project to co-ordinate grid connections. However, the Welsh Government would wish to see the disruption to communities and the land minimised. Our commitment under the Wellbeing of Future Generations Act requires a long-term approach to decision making.

We are aware that this consideration falls outside the remit of this DCO, but such significant infrastructure projects would have usefully been considered in a far more strategic approach. We need to consider the disruption created in delivering this project and has the potential to increase resistance to future works in the area and potentially slow other projects also needed to deliver clean electricity. Therefore, we consider this to be an opportunity to plan ahead to ensure future development has the least possible cost and impact.

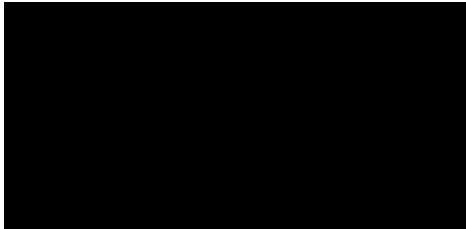
Net Zero Wales is leading on work to consider opportunities to ensure that planning authorities and NRW have the resource in place to be able to consider such large projects and to be able to discharge conditions. As some authorities might not have the resource in place, it would be useful to understand how the schedule within the DCO could take this into consideration to ensure there is funding made available to support the authorities in the work required to allow such projects to proceed as necessary. This would be a short-to-medium term response to the issue.

## **Conclusion**

Further and more detailed information can be provided separately if necessary and nominated officials from key areas stand ready to support the examination process.

Please accept this as a Welsh Government response to the current examination on the Mona project.

Yours sincerely



**Rhys Morris**

**Prif Swyddog Rhanbarthol, Gogledd, Canolbarth a Gorllewin Cymru /  
Chief Regional Officer, North, Mid and West Wales**

Grŵp yr Economi, Egni a Thrafnidiaeth / Economy, Energy and Transport Group  
Llywodraeth Cymru / Welsh Government

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:

ChiefRegionalOfficerNorth@gov.wales

Sarn Mynach, Cyffordd Llandudno / Llandudno Junction, Conwy LL31 9RZ

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



## **Appendix A - Cadw specific comments**

### **Historic Environment**

Cadw, the Welsh Government's historic environment service, has had discussions with the developers of the project and have produced a draft Statement of Common Ground.

The application is accompanied by an environmental statement (ES) prepared by RPS with chapter 5 and its appendices considering the impact of the proposed windfarm and its connection with an onshore substation to the south of the National Grid Bodelwyddan Substation.

### **Scheduled Monuments and Non-Designated Archaeological Sites**

#### Onshore

The proposed development will have no direct impact on any scheduled monuments. The ES has considered the impact of the proposed development on the setting of all scheduled monuments. It has identified that during the construction works for the connection to the substation there could be a minor, but not significant adverse effects on the settings of scheduled monuments DE008 Pen-y-Corrdyn Camp; FL004 Castell Rhuddlan; and FL015 Twthill: However, these effects will be temporary and once construction work has been completed there will be no impact on the settings of these scheduled monuments. I concur with this assessment and therefore have no objection to the proposed development due to its impact on the settings of scheduled monuments.

A geophysical survey of the majority of the corridor of the onshore cable connection to the substation has been carried out (820ha of the 841ha corridor route). This work has identified two well-defined anomalies suggestive of ditched enclosures, one of which is located near Betws Lodge Wood in the northern part of the corridor and a second one near Nant Meiford Farm in the central part of the route. With the exception of occasional ring ditch-type anomalies identified within the eastern half of the cable route, the remaining anomalies detected consist of a regular series of linear and curvilinear features that probably relate to previous agricultural regimes. A limited number of archaeological trenches have been excavated so far (75 of the 284 trenches proposed for the proposed evaluation work). This limited evaluation is due to the problems of gaining access for the works.

The two putative enclosures may be of National importance, although this will need to be confirmed by archaeological evaluation: However, it should be possible for the cable connection to be routed to avoid direct impact on them. The other anomalies identified by the geophysical survey are not thought to be archaeological sites that will be of National importance.

The ES proposes that the archaeological evaluation will be completed, and once that work has been completed (hopefully before the determination of the application) a programme for post-consent archaeological work will be agreed. This programme will identify areas where detailed archaeological investigation will be required in mitigation

of a direct impact on an archaeological site and will include detailed methodologies meeting current standards and guidance set by the Chartered Institute for Archaeologists and include details of the post-excavation analysis, the publication of the resulting report and the archiving of the records in an appropriate repository.

The current level of information supplied in the ES is sufficient to allow the impact of the proposed development on the non-designated archaeological sites to be properly considered in the determination of the current application and the proposed mitigation measures are appropriate.

### Offshore

The ES has considered the impact of the proposed development on the settings of scheduled monuments AN038 Dinas Gynfor Hillfort; AN024 Din Sylwy Hillfort; and AN064 Tower and remains of church and monastic settlement on Puffin Island. It has concluded that at worst there will be minor adverse, but not significant effects on the setting of these scheduled monuments. I concur with this conclusion.

The assessment of the Marine Archaeology has been carried out, so far, following appropriate surveys. Assessment of geophysical surveys and hydrographic data has identified 30 anomalies that are thought to represent archaeological sites and these will be protected by Archaeological Exclusion Zones around them. This will prevent any direct impact on them during the project.

The assessment has also considered the impact of the proposed development on unidentified archaeological features and considered that they likely impact effect on them will be a minor adverse. However, an Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries will be put in place in order that any archaeological sites or features revealed during the construction programme are appropriately investigated and recorded. These measures appear to be appropriate but the determining authority should consult the Maritime Investigator of the Royal Commission on the Ancient and Historic Monuments of Wales for specific advice on the effect of the proposed development on marine archaeology.

## **Registered Historic Parks and Gardens**

### Onshore

The proposed development will have a direct impact on the grade II\* statutorily registered Gwrych Castle historic park and garden as the cable route will cross through it. Mitigation measures have already been incorporated into the design of the cable route to lessen this impact by horizontally directional drilling underneath the park wall (listed building 199044) and also beneath tree belts, where the route of the trench cannot be designed around them. As such, open cut trenching, which will have a direct impact on the registered historic park and garden, will be confined to the open parkland which once reinstatement has been fully carried out will not be visible.

A small section of the park wall will be permanently removed to widen an existing access (this direct impact is discussed below in the listed building section): However, this change and the cable route across the registered historic park and garden will not

affect the way it is understood, experienced and appreciated Therefore, whilst it is noted that the ES has determined that the construction phase of the proposed development will have a moderate significant adverse effect on the registered Gwrych Castle historic park and garden, once the construction phase is completed this effect will reduce to low or negligible and not be significant.

The ES also considers the impact of the proposed development on the settings of the registered Kimmel Park and Bodelwyddan Castle historic parks and gardens. It has concluded that once construction work has been completed that there will be no effect on the registered Kimmel Park Castle historic park and garden and a minor but not significant adverse effect on the registered Bodelwyddan Castle historic park and gardens, which proposed landscaping and the planting of trees will reduce to no change. I concur with this conclusion.

### Offshore

The ES has considered the impact of the proposed development on the settings of the Conover House; Gwrych Castle; Wern Isaf (Rosebriars); Happy Valley registered historic parks and gardens. . It has concluded that, at worst, there will be minor adverse and not significant effects on these registered historic parks and gardens. It has also concluded that there will be a negligible adverse effect on The Flagstaff registered historic park and garden and no effect on the Penrhyn Castle registered historic park and garden. I concur with these conclusions.

## **Registered Historic Landscape**

### Onshore

The proposed development is located some 550m from the boundary of Lower Elwy Valley landscape of special historic interest. The ES has concluded that the presence of tall structures, such as cranes building the onshore substation during the construction phase of the proposed development, along with the long-term presence of additional modern structures in views from the historic landscape, could have a minor, but not significant impact on the setting of the registered historic landscape: However, proposed landscaping and tree planting will reduce this adverse impact to no change inside 15 years. I concur with this conclusion.

### Offshore

The ES has considered the impact of the proposed development on the settings of the registered Amlwch and Parys Mountain; Penmon; Ogwen Valley; North Arllechwedd; Lower Conwy Valley; and Creuddyn and Conwy historic landscapes. It has concluded that, at worst, there will be minor adverse but not significant effects on these registered historic landscapes. I concur with this conclusion.

## **Listed Buildings**

The proposed cable route will be horizontally directional drilled underneath listed building 199044 Gwrych Estate Boundary Wall from Tan-yr-Ogof to Gwrych Lodge and this will therefore not have any impact on it: However, an existing access through the

boundary wall will be widened for the use of construction traffic. The boundary wall at the location of this access is not original, having been realigned at some time after 1950 when the existing access was established. The ES considers the boundary wall to be of regional importance as it is a grade II listed building and therefore concludes that the effect of the loss of a small part of the wall as being minor adverse and therefore not significant. However, it should be noted that the Listed Building and Conservation Act 1990 does not provide grading for listed buildings (this is provided by subordinate legislation) and therefore the determining authority should be aware of the general duty as respects listed buildings in exercise of planning functions, given in section 66 (1) of that Act when considering this effect.

The ES has considered that the impact of the proposed substation on the setting of listed building 19929 Pentre Meredydd will be moderate adverse and therefore significant in EIA terms. Proposed mitigation measures including landscaping and tree planting are likely to reduce this effect to minor adverse and therefore not significant in EIA terms inside 15 years but the determining authority should be aware of the general duty in respect of listed buildings in exercise of planning functions given in section 66 (1) of the Listed Building and Conservation Act 1990 when considering this effect.

The ES has considered the impact of the proposed development on the settings of other listed buildings and considers that for the majority of these designated historic assets there will be no effect on their settings. However, it has concluded that during the construction phase of the proposed development there will be minor but not significant, effects on the settings of listed buildings:-

275 Barn, Agricultural Range and associated garden walls and towers at Hen Wyrch Farm

231 Gwrych Castle including attached walls and towers and Stable Block;

232 - Tan-yr-Ogof Lodge including adjoining walls and towers to S, E and W

80738 - Bryn Celyn Lodge on Bodelwyddan Park Boundary

19038 - Hen Wrych

19039 - Hen Wrych Lodge including adjoining crenellated boundary walls and towers

19040 - Plas Tan-yr-Ogof including adjoining walls and arches to E and W

19041 - Tan-yr-Ogof Farmhouse including adjoining arch and walls to E

19042 - Stable and Cart House Range at Tan-yr-Ogof Farm

and negligible effects on listed buildings:-

1442 - Southcroft including North Cottage

1443 - Staverton

1444 - Former Coach House, Stables & Outbuildings to Staverton & Southcroft

19036 Lady Eleanor's Tower.

19924 - Church of St Mary.

Mitigation measures including landscaping and tree planting will reduce these effects to negligible to no change inside 15 years. I concur with this conclusion.

## Offshore

The ES considered the impact of the windfarm on the settings of listed buildings and determined that for the majority of these designated historic assets there will be no effect on their settings: However, it has concluded that there will be minor but not significant, effects on the settings of listed buildings:-

231 Gwrych Castle including attached walls and towers and stable block  
3475 War memorial, Llandudno promenade  
3525 The Towers, Llanfairfechan  
3567 Wern Isaf (Rosebriars)  
3641 Llandudno Pier  
5366 Point Lynas Lighthouse and telegraph station  
5367 The Olde Telegraph  
5515 Pilot's Cottage (former) No. 1, Black Point  
5528 Remains of monastic settlement including tower and walls on Puffin Island  
5529 Telegraph Station (former), Puffin Island  
5797 Church of St Tudno, Great Orme  
5814 Great Orme's Head Lighthouse  
17095 Conover House (formerly Villa Marina)  
18028 Skerries Lighthouse with associated buildings and enclosure walls  
21615 Trwyn Du, or Black Point, Lighthouse  
24434 Carmel Head pilot beacon (south)  
24435 Carmel Head pilot beacon (north)  
24436 Pilot beacon on West Mouse  
26757 Pilot's Cottage (former) No. 2, Black Point  
Seafront hotels, Llandudno

I concur with this conclusion.

## **World Heritage Site**

### Offshore

The proposed windfarm will be visible, at times, from parts of the Penrhyn Slate Quarry and Bethesda, and the Ogwen Valley to Port Penrhyn section of The Slate Landscape of Northwest Wales World Heritage Site: However, when visible it will be viewed along with other windfarm structures. The ES concludes therefore that there will be no effect on the Outstanding Universal Value of the World Heritage Site. I concur with this conclusion.

## **Historic Environment Policy and Guidance**

Volume 7 annex 5.2 Historic Environment Policy and Guidance of the ES provides information on the legislation and other documentation that are relevant to the determination of the effect of the proposed development on the historic environment. It notes that the Historic Environment Act (Wales) 2023 has received Royal Assent states it will not be enacted until late 2024. It is however currently anticipated that this act will be enacted prior to the determination of the current application. The Act is a Consolidation Act and should not alter legislation, but references to the various parts of the Acts that have been consolidated will need to be changed to refer to the 2023 Act. The most important change is that section 66 (1) of the Listed Building and Conservation Act 1990 will become section 314A of the Town and Country Planning Act 1990.

Section 1.6 of this document refers to Planning Policy Wales (Edition 11 February 2021): However, this document has now been replaced by Planning Policy Wales (Edition 12 February 2024, although the paragraph numbers and policies reference in this section of the document remain the same.

Section 1.7 of this document refers to Technical Advice Note 24: The historic environment (2017) (TAN24). This document will be reissued when the Historic Environment Act (Wales) 2023 is enacted: However, the changes will be references to the new Act and no new guidance will be provided.

Sections 1.7.10 to 1.7.26 refers to various best practice guides produced by Cadw on behalf of the Welsh Government like TAN24 these documents are due to be reissued when the Historic Environment Act (Wales) 2023 is enacted: However, the changes will be references to the new Act and no new guidance will be provided.