



## **Written Representations from SP Energy Networks in relation to the Mona Offshore Wind Farm Project Ref EN010137 7<sup>th</sup> August 2024**

### **Introduction**

SP Energy Networks (SPEN) is part of the Scottish Power Group of companies. SPEN operates the electricity distribution networks in the Central Belt and South of Scotland (the asset owner being SP Distribution plc (SPD)) serving 2 million customers and 1.5 million customers in England (in Merseyside, Cheshire and North Shropshire) and North Wales are served by the asset owner SP Manweb plc (SPM)). SPEN also own and maintain the electricity transmission network in Central and South Scotland (SP Transmission plc (SPT)). This response is from SPEN's Planning section which manages all planning and energy consents activities for the three licence areas.

SPEN is responsible for the operation, maintenance and continuing development of the distribution and transmission networks across our network areas. We have extensive experience of environmental and planning matters in England, Wales and Scotland, and this will continue to be of the utmost importance to our activities as we invest in our networks in order to help deliver Net Zero targets.

As a regulated networks business, our revenues and outputs are controlled closely within a regulated price control framework by Ofgem. The RIIO-ED2 framework has been operational from April 2023. The current price control period is seeing continuing and significant levels of investment in modernising and strengthening our electricity network to ensure it can continue to meet the current and future demands of consumers and business in the UK. For RIIO-ED2, this equates to a planned of investment in our distribution networks of approx. £3.3bn from 2023 to 2028 to provide electricity users across Britain with a safe, reliable and efficient supply of electricity whilst not being a barrier to progress towards Net Zero targets. It is important that SPEN is able to operate within the price control mechanism during these times without significant or unforeseen change to the overall requirements imposed by the planning system.

It is critical that the planning system recognises the importance of a strong and resilient electricity supply network that will contribute to achieving Net Zero, such as the roll-out of EV charging and the electrification of heating requirements and that electricity networks are a facilitator for decarbonisation. SPEN therefore needs to protect the existing electricity network from uncontrolled development which impacts on the running of this network and results in additional costs to reconfigure the network to avoid such impacts.

SPEN has advised the promoter of areas requiring further consideration at the statutory consultation stage in May 2023.



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Following late notification of the project progressing to the Examination stages, SPEN notified the Planning Inspectorate of its preliminary comments in June 2024. The following builds on these earlier comments.

### **SPEN observations on the Mona Offshore Wind Farm Project**

The main component of the proposed offshore wind farm of interest to SPEN is the proposed onshore cables, in respect of which SPEN has noted in the Environmental Statement Non-Technical Summary (Doc Ref APP-047) the following:

*1.8.5.2 A maximum of four cable circuits has been assumed as the maximum design parameter for the environmental assessment. Each cable circuit will consist of three cables, giving a total of up to 12 cables. Once installed, the cables will occupy a permanent easement of approximately 30 m wide, although this width may change where obstacles are encountered. In addition to the above, fibre-optic cables are likely to be required for communications and temperature sensing. This may include up to one communications and one temperature sensing fibre-optic cable per circuit.*

*1.8.5.3 The Mona Onshore Cable Corridor will route south from the landfall and pass to the west of Abergele. The Mona Onshore Cable Corridor will be approximately 15 km in length and up to 74 m wide (including the temporary construction width). The width of the corridor may increase to 100 m at crossings where trenchless techniques will be used. The cables will be buried underground at a target depth of 1.8 m. This target burial depth may be increased where the route is required to cross beneath existing utilities such as pipelines, land drains, highways or rivers.*

Furthermore, reference to the Works Plan (Doc no. AS – 003) shows there to be proposed planting and environmental works under SP Manweb apparatus.

The submitted Crossings Schedule (Document APP -083) lists various crossing points and refers to where trench and trenchless crossings are proposed.

SPEN acknowledges that the draft DCO (Document AS-010) allows for diversions where necessary within the order limits and the protective provisions in Schedule 2 Part 4 require agreement with SPEN on works within 15m of SPEN assets.

Following its review of the DCO documents, SPEN has identified a need for the promoter to address the following:

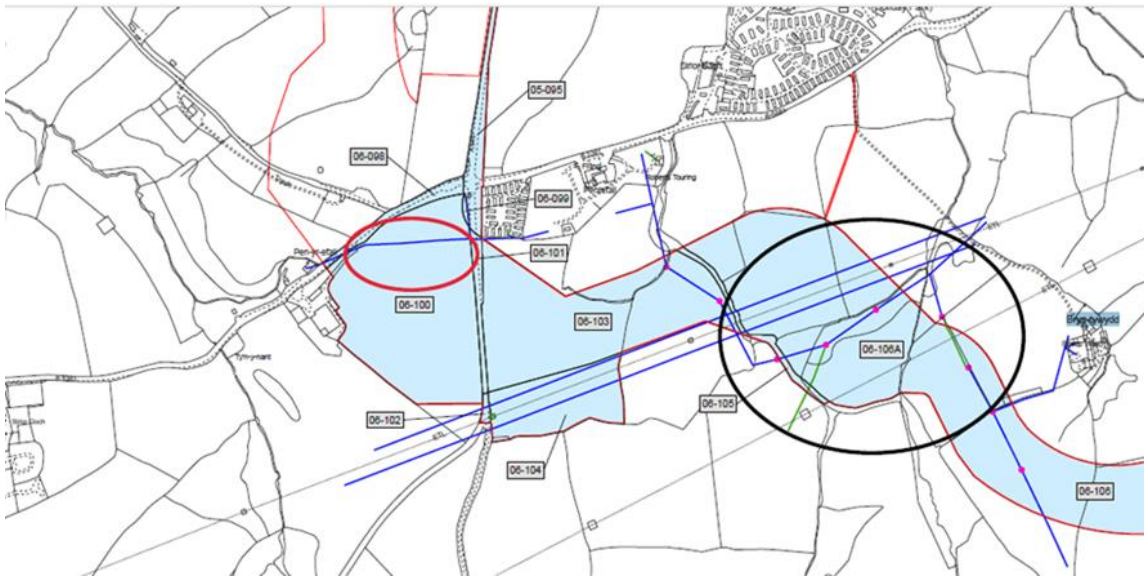
- Clearly show where impacts on the SPEN network arise for both parties to manage these impacts in an agreed manner through appropriate controls in the DCO such as protective provisions and requirements; and
- ensure the agreed measures are made clear to contractors working on site through required control measure documents such as method statements



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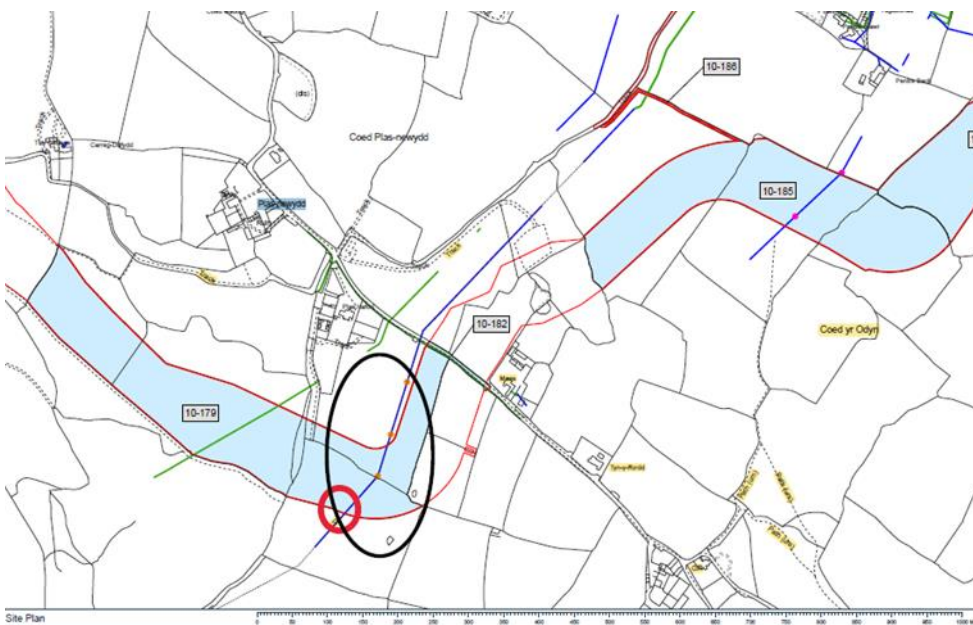
### Bryn-tywydd

At this location, there are 11kV poles the movement of which is restricted by the 132kV overhead line (the red circled area highlights poles not shown).



### Plas-newydd

At this location, the 132kV circuit is a double wood pole line from a customer wind farm to St Asaph Grid Substation

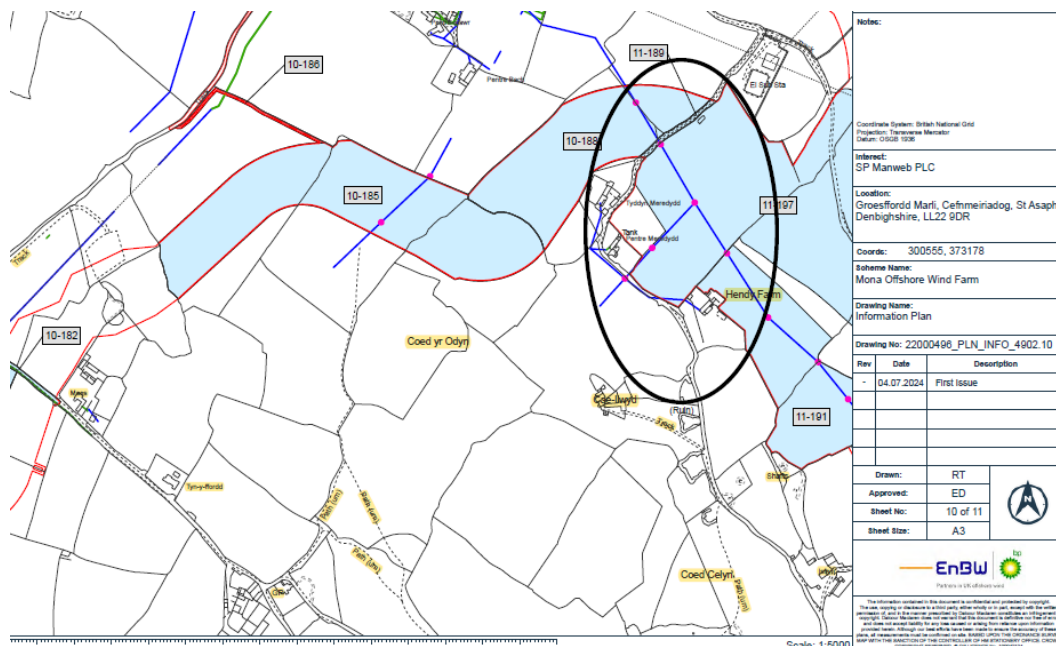


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### Hendy Farm

At this location, there are a number of wood poles to avoid and in addition, the area leading into the substation is a proposed landscaping area, the design of which needs to be considered in detail as some planting is not compatible with the SP Manweb apparatus.



### SPEN Changes

1. SPEN considers that the Crossing Schedule document does not show the affected SPEN assets in sufficient detail to identify likely impacts and therefore doubts that the proposed technology is correct. For example, the Ffynhonnau crossing shows a combination of trenching, trenchless or either. SPEN requires the onshore crossing schedule document to be amended to include details of the SPEN assets as available in the new crossover plan and the outcome of a review of the crossing techniques for these assets shown in the revised crossing schedule document submitted to the Examination.
2. SPEN notes the protective provisions largely cover matters as required, however, there are minor changes, for example in terms of some technical references, which need to be made. SPEN intends to discuss these with the applicant and changes incorporated into the next updated draft DCO at Deadline 2.
3. As SPEN understands that further technical details are yet to be developed, and noting the reference to the target burial depth which is critical to SPEN ensuring impacts on its



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networks are avoided, SPEN considers it necessary to be included in further issues of information relating to the trenchless technologies and considers this justifies being consulted on this information. SPEN therefore requires Requirement 6 included in the draft DCO to be amended as highlighted in red below as follows:

*Detailed design parameters onshore*

*6.—(1) The onshore works must not exceed the parameters assessed in the environmental statement and set out in sub-paragraphs (2) and (3).*

*(2) The maximum number of transition joint bays must not exceed four.*

*(3) In relation to Work No. 22a—*

*(a) the highest part of any building must not exceed 15 metres above finished ground level;*

*(b) the highest part of any external electrical equipment, excluding lightning rods, must not exceed 12.5 metres above finished ground level;*

*(c) the total area of the fenced compound (excluding its accesses) must not exceed 65,000 m<sup>2</sup>; and*

*(d) the total number of lightning rods within the fenced compound area must not exceed 12 and the height of any lightning rod must not exceed 30 metres above finished ground level.*

*(4) Trenchless installation techniques must be used to install the cable ducts and electrical circuits where identified in the onshore crossing schedule for the purpose of passing under a relevant obstruction unless otherwise agreed by the relevant planning authority, following consultation with the highway authority **and SP Energy Networks**.*

In relation to the proposed landscaping under SPEN assets, SPEN requires to be consulted on the further detail and suggests Requirement 7 is amended as follows:

*Provision of landscaping*

*7.—(1) Work No. 22 must not be commenced until a landscape plan and associated work*



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programme has been submitted to and approved by the relevant planning authority following consultation with NRW and SP Energy Networks as appropriate.

(2) The landscape plan must accord with the outline landscape and ecology management plan and must include details of all proposed hard and soft landscaping works including—

(a) location, number, species, size and planting density of any proposed planting including any trees; and

(b) implementation timetables for all landscaping works.

(3) The landscape plan must be implemented as approved.

### **Ensure the agreed measures are made clear to contractors working on site through required method statements**

SPEN has advised the promoter that measures in the draft PPs will also need to be outlined in the relevant method statements. SPEN has advised that the draft CoCP should include specific reference to the required standard measures to divert and working closely around affected network. To ensure this is the case, SPEN considers it necessary to consult on the detailed CoCP and as such requires Requirement 9 to be amended as highlighted in red as follows:

#### *Code of construction practice*

*9.—(1) No stage of the onshore works may commence until for that stage a code of construction practice has been submitted to and approved by the relevant planning authority following consultation with NRW and the relevant highways authority as appropriate, and where relevant to the Construction Method Statement, SP Energy Networks.*

*(2) The code of construction practice must accord with the outline code of construction practice and include, as appropriate to the relevant stage—*

*(a) spillage and emergency response plan;*

*(b) dust management plan;*

*(c) construction noise and vibration management plan;*

*(d) construction traffic management plan;*

*(e) highways access management plan;*



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- (f) communications plan;*
  - (g) construction fencing plan;*
  - (h) construction surface water and drainage management plan;*
  - (i) flood management plan;*
  - (j) public rights of way management strategy;*
  - (k) soil management plan;*
  - (l) site waste management plan;*
  - (m) artificial light emissions plan;*
  - (n) biosecurity protocol;*
  - (o) discovery strategy for contaminated land;*
  - (p) arboriculture method statement;*
  - (q) onshore construction method statement; and*
  - (r) landfill construction method statement.*
- (3) Each code of construction practice must be implemented as approved.*

**Ensure existing land rights are protected**

SPEN is continuing to review the many crossing points and cross reference these in the Book of Reference and expects to be discussing these land interests with the applicant soon.

Given this ongoing position, SPEN requests a holding position on its intentions to attend the Compulsory Acquisition Hearing.