

# MONA OFFSHORE WIND PROJECT

## Response to Welsh Government and Cadw's Written Representations

Deadline: 2

Application Reference: EN010137

Document Reference: S\_D2\_3.1

Document Number: MOCNS-J3303-RPS-10289

27 August 2024

F01



Image of an offshore wind farm

## MONA OFFSHORE WIND PROJECT

---

### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D2	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	27 Aug 2024

---

---

Prepared by:

**RPS**

Prepared for:

**Mona Offshore Wind Ltd.**

---

**MONA OFFSHORE WIND PROJECT**

---

**Contents**

**RESPONSE TO WELSH GOVERNMENT AND CADW'S WRITTEN REPRESENTATIONS..... 1**

**1 RESPONSE TO WELSH GOVERNMENT AND CADW'S WRITTEN REPRESENTATIONS ..... 1**

1.1 Introduction..... 1

**2 RESPONSES AT DEADLINE 2 TO WRITTEN REPRESENTATIONS..... 2**

2.1 Welsh Government..... 2

2.2 Cadw ..... 19

**Tables**

Table 2.1: Welsh Government..... 2

Table 2.2: Cadw ..... 19

## MONA OFFSHORE WIND PROJECT

### Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

## MONA OFFSHORE WIND PROJECT

Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
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 Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables 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.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

## MONA OFFSHORE WIND PROJECT

Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).



## MONA OFFSHORE WIND PROJECT

Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

## Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WSI	Written Scheme of Investigation
WTW	Wildlife Trust Wales

## MONA OFFSHORE WIND PROJECT

Acronym	Description
TWT	The Wildlife Trusts

## Units

Unit	Description
GW	Gigawatt
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles



# 1 Response to Welsh Government and Cadw's Written Representations

## 1.1 Introduction

1.1.1.1 Details of the Applicant's response to the Written Representations (WRs) of Welsh Government and Cadw are set out in the subsequent sections of this document.

1.1.1.2 The Applicant has numbered the WRs in line with the Planning Inspectorate's document library, with subsequent paragraph number e.g. REP1-050.1, REP1-051.1 etc.

## 2 RESPONSES AT DEADLINE 2 TO WRITTEN REPRESENTATIONS

### 2.1 Welsh Government

Table 2.1: Welsh Government

Reference	Written Submission Comment	Applicant's response
REP1-052.1	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Thank you for providing Written Representation to the Examination of the Mona Offshore Wind Farm Project at Deadline 1. The applicant welcomes your comments and provides responses below.</p>

## MONA OFFSHORE WIND PROJECT

Reference	Written Submission Comment	Applicant's response
	<p>the topic specific areas to date. This response is framed to provide you with a cross-government view.</p>	
<p>REP1-052.2</p>	<p>Overview</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Applicant provided a Planning Policy Update Note to the Examination at the Procedural Deadline A (PDA-036) to provide a review of the updates to Planning Policy Wales (PPW) edition 12 and any consequential effect to the planning assessment of the Project.</p> <p>PDA-036 confirmed that substantial changes to policy wording between PPW11 and PPW12 are broadly limited to Chapter 6. As these changes were published in October 2023, the Planning Statement (APP-186) and other documents in the Mona Offshore Wind Project DCO application have taken account of them and are in accordance with them.</p>
<p>REP1-052.3</p>	<p>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:</p> <ol style="list-style-type: none"> <li>1. A just transition and green prosperity</li> <li>2. A platform for young people, fair work, skills and success</li> <li>3. Stronger partnerships for stronger regions and the everyday economy</li> <li>4. Investing for growth</li> </ol>	<p>The Applicant notes your response.</p> <p>There will be multiple socio-economic benefits associated with the Mona Offshore Wind Project as described in the socio-economics chapter (APP-077) and section 1.5.25 of the Planning Statement (APP-186), which aligns with the Welsh Government's Economic Mission policy.</p>
<p>REP1-052.4</p>	<p>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</p> <p>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.</p>	<p>The Applicant notes your response, compliance with The Environment Act is outlined in the Planning Statement (APP-186)</p>
<p>REP1-052.5</p>	<p>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</p>	<p>The Applicant has committed to the provision of a Skills and Employment Plan which is secured at Requirement 19 of the draft Development Consent Order (DCO), and must be in accordance with the Outline Skills and Employment Plan (APP-210) (OSEP). The actions presented within the OSEP will form the basis of a post-consent Skills and Employment Strategy, which will be adopted by the Applicant to help develop and</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p>	<p>support the economic benefits associated with the Mona Offshore Wind Project in relation to skills and employment within the offshore wind sector. The Applicant welcomes further engagement with Welsh Government to ensure a strategic approach is taken.</p> <p>The Applicant appreciates the comments about community benefits and the Invitation to Tender for a Principal Contractor will include provisions that it shall develop a Community Investment Plan to include a community benefit fund for local initiatives. Any future strategy for community benefits would be developed in collaboration and partnership with Welsh Government and other key stakeholders, taking into account existing provision, policy and best practice.</p>
<p>REP1-052.6</p>	<p>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.</p> <p>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-</p>	<p>The impacts to Clwydian Range and Dee Valley Area of Outstanding Natural Beauty National Landscape (previously AONB) have been assessed in the Landscape and visual resources chapter (APP-069).</p> <p>The Outline Landscape and Ecology Management Plan (LEMP) (J22 F02) supports the Development Consent Order (DCO) application for the Mona Offshore Wind Project. The Outline LEMP provides general principles and objectives for all mitigation, enhancement, monitoring and management of the landscape and ecology. The Outline LEMP confirms the commitment to create new woodland, ponds, grassland and hedgerow around the Onshore Substation and at locations along the Onshore Cable Corridor to ensure a high-quality environment is created within the Mona Onshore Development Area and surrounding landscape. A detailed LEMP is required by Requirement 12 of the draft Development Consent Order (C1 F04) and will be submitted in discharge of the requirement prior to commencement of the onshore construction works.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
REP1-052.7	<p>designated). There may be future implications of the designation on the onshore development linked to Mona.</p> <p>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.</p>	<p>The approach taken for the Mona Offshore Wind Project regarding biodiversity enhancement is outlined in the Biodiversity benefit and green infrastructure statement (APP-193).</p> <p>As stated in the Planning Statement (APP-186), the offshore environmental impact assessment has confirmed that the Project is compliant with Welsh National Marine Plan Policies ENV01 and ENV02 (see paragraphs 1.5.2.19 – 38, paragraphs 1.5.3.18 – 41, paragraphs 1.5.4.14 – 30, paragraphs 1.5.5.13 – 32 and paragraphs 1.5.6.11 – 24).</p>
REP1-052.8	<p>Housing</p> <p>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</p>	<p>The assessment of effects in respect of Socio-Economics is set out in Environmental Statement - Volume 4, Chapter 3: Socio-economics (APP-077). The social study areas cover the North Wales sub-region and the North West England region. This reflects the strategic nature of the Mona Offshore Wind Project and the reach of potential socio-economics effects. This enables the assessment to consider the overall effects in proportion to the scale of the project. The potential offshore and onshore impacts on population, housing and accommodation have the potential to arise through the overnight, short term (temporary), or long term (permanent) relocation of workers into social study areas. The potential impact on population, housing and accommodation (North Wales) has been assessed as Minor (beneficial) (construction); Minor (neutral) (operation); and Minor (beneficial) (decommissioning). Potential effects in North Wales are assessed as not significant in EIA terms. The potential impact on population, housing and accommodation (North West England) has been assessed as Minor</p>

Reference	Written Submission Comment	Applicant's response
	<p>and reduce additional pressure on the housing stock within communities.</p>	<p>(beneficial) (construction); Minor (neutral) (operation); and Minor (beneficial) (decommissioning). Potential effects in North Wales are assessed as not significant in EIA terms.</p> <p>The Community and Linguistic Impact Assessment (APP-045) has been produced to consider the predicted effects of the Mona Offshore Wind Project on the community in general and, more specifically, on the Welsh language and culture across a number of key aspects. Where adverse and beneficial effects are identified, measures are proposed to mitigate adverse effects and enhance beneficial ones. The study notes that understanding the use of the Welsh language in the study area is important to the assessment process, and sets a baseline for the study area. The assessment identifies an overall neutral effect in terms of population characteristics, quality of life, infrastructure supply and social and cultural aspects, with a beneficial effect in terms of local employment opportunities. The assessment also concludes a potential beneficial effect on local employment opportunities, with the Skills and Employment Plan (APP-210) considering enhancement of local opportunities.</p> <p>The Applicant will engage with the Welsh Government's Welsh Language Unit and the office of the Welsh Language Commissioner as the project progresses to ensure that ongoing consideration is given to the Welsh language.</p>
<p>REP1-052.9</p>	<p>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.</p> <p>The Outline Skills and Employment Plan (Reference Number: MOCNS-J3303-RPS10160, 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.</p> <p>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</p>	<p>The Outline Skills and Employment Plan (APP-210) (OSEP) sets out an outline approach – the outline actions presented within the OSEP will form the basis of a post-consent Skills and Employment Strategy, which will be adopted by the Applicant to help develop and support the economic benefits associated with the Mona Offshore Wind Project in relation to skills and employment within the offshore wind sector.</p> <p>The Applicant has engaged with the North Wales Regional Skills Partnership, its members and various other important stakeholders in the skills sector such as local providers throughout the development of the project and is committed to further engagement on an ongoing basis. The Skills and Employment Strategy, which will be informed by a community needs analysis, will be secured through Requirement 19 of the draft DCO. The comments in respect of further information to be included in the post-consent Skills and Employment Strategy are noted, and will be considered during its preparation.</p>



**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>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.</p>	
<p>REP1-052.10</p>	<p>Additionally:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p><u>Further evidence on what proportion of the workforce is likely to be local</u></p> <p>The assessment in ES Volume 4, Chapter 3: Socio-economics (APP-070) assumes that employment opportunities will be filled by local residents from the following categories:</p> <ul style="list-style-type: none"> <li>• Local workers in relevant sectors</li> <li>• Local workers transitioning from the offshore Oil and Gas sector</li> <li>• Local resident entrants to the sector resulting from training activities</li> <li>• Non-local workers commuting to the selected locality</li> <li>• Non-local worker relocation to the selected locality.</li> </ul> <p>Assumptions regarding proportions are set out in more detail within ES Volume 4, Chapter 3: Socio-economics and ES Volume 8, Annex 3.1: Socio-economics technical impact report (APP-184).</p> <p><u>Skills requirements</u></p> <p>Please see response to Reference 5, above.</p> <p><u>Displacement of existing skills and ancillary workforce requirements</u></p>



**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p>	<p>The selection process associated with the identification of ports, inputs, and services will not conclude until the post-consent phase for the Mona Offshore Wind Project, which is typical for offshore wind farms. Final manufacturing, fabrication, marshalling, installation, and operation delivery models will be subject to ongoing engineering and procurement considerations. It is therefore not possible at this stage to confidently estimate existing skills displacement and ancillary workforce requirements.</p> <p><u>Worker relocation</u></p> <p>It is estimated that 34 workers would relocate to North Wales (offshore = 25, onshore = 9) during the operation and maintenance phase. The onshore workers are linked to the location of onshore infrastructure, which is not subject to change. Offshore workers are linked to port selection, which (as described above) is not fixed.</p> <p>Assuming every worker relocates to North Wales along with their family, this increases the overall population impact to 87 (offshore = 65, onshore = 22).</p> <p>Assuming the identified offshore activity is located within North Wales, it would be unrealistic to assume that all 34 workers would relocate within the same school catchment area, placing all additional pupil population impacts on a single school. Migration, commuting, and housing market dynamics would make it likely that relocating workers would be spread across North Wales, and would not be concentrated within a single community i.e. relocating workers are not tied to the immediate vicinity of the place of work that is triggering their relocation.</p> <p>As such, an additional 34 workers (along with a further 53 family members), spread across multiple communities and the associated school catchment and local health service areas, can reasonably be assumed to fall within the typical population churn of even the smaller communities where workers and their families would relocate to.</p> <p>The Community and Linguistic Impact Assessment (APP-045) considers the in/out migration of works, against the baseline migration of the region, and concludes there will be no temporary or permanent change for any phase of the project, with no effect on the balance of Welsh/non-Welsh speakers in the region. The Assessment also confirms that identified potential impacts on the education service are anticipated to be neutral during the construction, operation and maintenance and decommissioning phases of the project.</p>
<p>REP1-052.11</p>	<p>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</p>	<p>Noted. The Applicant will seek to engage with Transport for Wales and local authorities in order to optimise sustainable travel opportunities during construction.</p> <p>The Outline Construction Traffic Management Plan (J26.13 F02) sets out the measures relating to the movement of construction vehicles and the mechanism to promote sustainable travel measures amongst construction staff. A detailed Construction Traffic Management Plan will be prepared as a requirement of the draft Development Consent Order (Requirement 9) which will be substantially in accordance with the Outline Construction Traffic Management Plan.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>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.</p> <p>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.</p>	
<p>REP1-052.12</p>	<p><b>Port and Supply Chain</b></p> <p>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 cause of examination.</p> <p>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.</p> <p>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.</p> <p>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).</p>	<p>The Applicant is grateful to Welsh Government for the information set out within their Written Representation regarding ports and supply chain opportunities in Wales. As Welsh Government notes, the Applicant has been engaging with Welsh Government on these matters through the development of the project to date, and will continue to engage with Welsh Government on supply chain and port opportunities, and how these might be leveraged to improve economic benefits in the region.</p> <p>The Applicant also continues to engage with other national, regional and local organisations, such as the Regional Skills Partnership, industry trade organisations (including the Offshore Energy Alliance), port operators, and businesses in the supply chain, to understand the capabilities in the region and how the Applicant, and others, may be able to work towards strengthening and utilising these capabilities.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>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 coordinated 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&amp;M) capability, building on some of the strengths that are already present in the north Wales region and beyond.</p> <p>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.</p> <p>The Welsh Government has committed to support ports across Wales.</p>	

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>Within the WTS the Welsh Government has set out its Ports and maritime transport Priorities over the next five years which will include:</p> <ul style="list-style-type: none"> <li>• investing in projects that deliver more sustainable ports infrastructure and which contribute to decarbonisation in the sector;</li> <li>• working with ports in Wales to identify opportunities for future economic development such as offshore renewable energy and innovations in decarbonisation.</li> <li>• 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.</li> <li>• 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.</li> </ul>	
<p>REP1-052.13</p>	<p>Health and Public Services</p> <p>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.</p>	<p>Informed by a detailed evidence base ES Volume 4, Chapter 4: Human Health assessment (APP-078) has assessed the potential for the Mona Offshore Wind Project to affect health and healthcare services. The assessment has had regard to communities in proximity to landfall, the cable corridor and the onshore substation. The assessment concludes that Mona Offshore Wind Project should not result in any significant adverse health effects for the local population.</p>
<p>REP1-052.14</p>	<p>Woodlands and Trees</p> <p>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.</p> <p>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:</p>	<p>The mitigation measures proposed for the Mona Onshore Substation are presented in Figure 6.5 and are described in section 6.8 of Volume 3, Chapter 6: Landscape and visual resources (APP- 069). The mitigation measures include planting to mitigate landscape and visual effects which will compensate for tree and woodland losses. Every effort has been made to minimise the loss of veteran trees and to restore or make good historic hedgerows.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
<p>REP1-052.15</p>	<p>Tree Survey and Arboricultural Impact Assessment Part 1 (J26.18 F02) This states at page 4 in response to Woodland Trust, that</p> <ul style="list-style-type: none"> <li>• “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”.</li> <li>• “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.”</li> </ul> <p>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.</p> <p>While a loss of “less than 55 trees” is quoted at para 1.9.5, there is</p> <ul style="list-style-type: none"> <li>• No indication of whether any of these are ancient or veteran trees (not clear whether the original statement to the Woodland Trust still stands).</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>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.</p> <p>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 (J22 F02) at Table 1.6 will actually replace what is being removed, which should be a minimum. This needs to be addressed and made clear.</p> <p>Planning Policy Wales 12 Chapter 6 was updated in February 2024.</p>	<p>Ancient woodlands and Veteran/Ancient trees have been avoided. The impacts/removals required relate mainly to the substation development as the operation and maintenance of the Project should not necessitate the removal of trees or encroachment on any Root Protection Areas (RPAs).</p> <p>The confirmation of which trees will be removed, and their category and Veteran/Ancient status will be finalised in the Arboricultural Method Statement which is secured under Requirement 9 of the draft Development Consent Order. At present no Veteran or Ancient trees are to be removed.</p> <p>The Applicant notes that ash woodland block (W2) links two ancient woodland sites, however the woodland is badly affected by ash die-back The proposals as set out in the Outline LEMP (J22 F02) are to selectively fell the affected trees and to encourage natural regeneration with supplementary planting (excluding the area required for the access road) to expand the area of ancient semi-natural woodland improve the woodland link . The area of W2 loss is 0.087 Ha, the increase in woodland planting area is 6.065 Ha and therefore the loss is mitigated by an increase of an area that is 69.7 times larger than the loss.</p> <p>The impacts on Llanddulas Limestone and Gwyrch Castle Wood Site of Special Scientific Interest (SSSI) are not considered as trenchless techniques will be used to route the cable below ground (as shown in Volume 5, Annex 4.3: Onshore Crossing Schedule F02 (REP1-007) and this will have no impacts on the trees.</p> <p>.The Applicant notes that the areas of woodland lost and area of planting will be confirmed in the tree survey clarification note to be submitted at Deadline 3.</p>

Reference	Written Submission Comment	Applicant's response
	<p>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.</p>	
<p>REP1-052.16</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Applicant notes that the total woodland losses and woodland planting will be set out in the tree survey clarification note that will be provided at Deadline 3. It is not possible to confirm the exact lengths of hedgerow to be removed at this stage as the final onshore cable route and installation technique has yet to be confirmed. A worst-case scenario comprising the maximum possible hedgerow removal has been assessed in the Onshore Ecology chapter (APP-066), which total 7 km of temporary hedgerow removal.</p> <p>The Outline Landscape and Ecology Management Plan (LEMP) (J22 F02) provides for maintenance and monitoring over a 5 year period. This is considered to be an adequate and generally acceptable timescale to allow for the successful establishment of proposed planting. Following a 5 year aftercare period, the proposed planting will be established and will have achieved a level of growth and partial canopy cover that will allow it to mature successfully and for the full mitigating effect to take place at year 15 of operation.</p> <p>Detail of establishment techniques and protection during establishment will be provided in the detailed LEMP which is secured by Requirement 12 of the draft Development Consent Order.</p>
<p>REP1-052.17</p>	<p>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:</p>	<p>RPAs are produced using the relevant sections of BS5837:2012 and the Standing Advice on Protection of Veteran and Ancient tree provided by the Forestry Commission and Natural England. The limit of 12 m radius will only be applied to non-</p>



Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Veteran/Ancient trees as identified in BS5837, the Outline Arboricultural Method Statement (J26.18 F02) has been updated to clarify this.</p> <p>Dust management primarily covered in the Outline Dust Management Plan (J26.2 F02) which includes measures such as the use of water for dust/particulate matter suppression/mitigation. The reference in the Outline Arboricultural Method Statement (J26.18 F02) is a method that could be used in a situation where excessive dust was accumulating on the leaves of trees.</p> <p>The applicant has included controls to manage the impact on soils during construction in the Outline Soil Management Plan (SMP) (J26.8 F02). A detailed SMP will be produced which will be substantially in accordance with the Outline SMP prior to construction and is secured under Requirement 9 of the draft Development Consent Order.</p> <p>The Applicant is aware of some erroneous repetition of tree group data in APP-161. It is the Applicant's intention to prepare a tree survey clarification note at Deadline 3 and will identify any errata in this note. .</p>
<p>REP1-052.18</p>	<p>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 is the site selection process, for both the substations and refinement of the onshore cable route.</p>	<p>The Applicant notes your response.</p>
<p>REP1-052.19</p>	<p>3. Land Use – (APP-070 – ES Vol 3 – Chapter 7 – Land Use and Recreation).</p>	<p>The effect of the Project on the best and most versatile land has been fully assessed in ES Chapter 7, using both the Predictive ALC mapping supported by ALC survey work. The permanent loss of Grade 3a quality agricultural land (i.e the lowest quality of best</p>



**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p>	<p>and most versatile land) associated with the Project is limited to approximately 1.7ha of land.</p> <p>The criteria for assessment are in accordance with the DMRB criteria and were included in PEIR submissions for Land Use and Recreation, where no comment was made on the application of this methodology. The IEMA guidance refers to the fact that:</p> <p><i>"The Design Manual for Roads and Bridges (DMRB) EIA guidance sets out the assessment criteria and methodology for highway projects only; however, aspects of the DMRB guidance are sometimes applied to other project types such as linear energy infrastructure. The effects on the highest quality land within the cable corridor is identified in the DMRB to be of high or very high sensitivity within the guidance and has been assessed in accordance with this".</i></p> <p>The IEMA guidance states, in relation to the assessment of land and soil that, based on the TAN 6 guidance on consultation, that <i>"in Wales, more than 20 ha BMV loss is considered 'nationally significant'".</i></p> <p>As a nationally significant infrastructure project and on the basis that the Project would lead to the permanent loss of approximately 1.7ha of best and most versatile Subgrade 3a land, the permanent effect of the Project on best and most versatile land has been assessed not to be significant.</p>
<p>REP1-052.20</p>	<p>4. Outline Soil Management Plan.</p> <p>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.</p>	<p>The Applicant notes the suggestion that further detail should be provided at this stage on the relevant loQ guidance sheets for stripping, storage and placement methods. The Applicant has committed to the application of the relevant methodology from the loQ guides, but the appropriate guidance sheets would be identified during the detailed design of the Project and included in the final Soil Management Plan to be provided as part of the Code of Construction Practice (Requirement 9 of the DCO (PDA-003)).</p> <p>The location of the cables in cement bound sand would displace small volumes of subsoil materials. Where required the final Soil Management Plan will identify the proposals for the sustainable reuse of any excess materials as part of the Code of Construction Practice (Requirement 9 of the DCO (PDA-003)).</p>
<p>REP1-052.217</p>	<p>Funding opportunities from procurement</p> <p>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</p>	<p>The Applicant is engaged with a number of national and regional organisations to understand the supply chain opportunities within Wales, and would welcome further discussion with Welsh Government on the principles of the Wales Procurement Policy Statement framework.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	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.	
REP1-052.22	<p>Grid in Wales</p> <p>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.</p>	As set out in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016) the Applicant has not included overhead lines within the project design envelope. All cables will be buried underground.
REP1-052.23	<p>Hydrogen</p> <p>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.</p>	The Applicant would be happy to discuss the role of the Project within the wider energy system in Wales with Welsh Government.
REP1-052.24	<p>Circular Economy and Decommissioning</p> <p>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.</p> <p>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.</p>	Requirement 20 and Requirement 21 of the draft Development Consent Order (DCO) secure the requirement for a written decommissioning programme in respect of the offshore elements of the Project and a written scheme of decommissioning in respect of the onshore elements of the Project to be submitted and approved by the relevant regulator. It is not practical for a decommissioning strategy to be produced to inform the application for Development Consent Order, as waste management and recycling practices are continually evolving and therefore it is unlikely that measures set out in a decommissioning strategy at this stage will still be relevant at the point of decommissioning. It is however anticipated that the regulators would require a decommissioning plan to follow the relevant waste hierarchy at the time, in discharging this obligation.
REP1-052.25	<p>Impact Mitigation</p> <p>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</p>	<p>See the Applicant's response to REP1-052.22 regarding assessment of cumulative impacts.</p> <p>The Applicant would also welcome discussions with Welsh Government on community benefits, including the approach and relevant guidance to be considered.</p>

## MONA OFFSHORE WIND PROJECT

Reference	Written Submission Comment	Applicant's response
	<p>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.</p> <p>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</p>	<p>Any future strategy for community benefits would be developed in collaboration and partnership with Welsh Government and other key stakeholders, taking into account existing provision, policy and best practice.</p>
<p>REP1-052.26</p>	<p>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.</p> <p>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.</p> <p>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</p>	<p>The decision for the connection point for the Mona Offshore Wind Project was determined by National Grid Electricity System Operator (NGESO). Mona Offshore Wind Project was scoped into the Holistic Network Design (HND) process as a pathway to 2030 project by NG ESO. Ultimately, NGESO concluded, through the HND process, that the preferred connection option representing the most optimal design considering all criteria for the Mona Offshore Wind Project was a single radial grid connection into Bodelwyddan substation in Denbighshire, North Wales.</p> <p>The cumulative affects assessment (CEA) throughout all chapters within Volume 3 has considered the Mona Offshore Wind Project, alongside the National Grid Bodelwyddan substation extension proposal. The CEA has been undertaken on the basis of the latest available information in the public domain, which is the Autumn 2023 consultation material. It is understood that the application for the proposal is imminent. If further information is available for the proposal before the decision on the Mona Offshore Wind Project the Applicant will provide an update to the cumulative assessment, presented within those relevant chapters within Volume 3.</p>

**MONA OFFSHORE WIND PROJECT**

Reference	Written Submission Comment	Applicant's response
	<p>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.</p>	<p>Mitigations included within the Mona Environmental Statement are based on assessment outcomes of that CEA. Should further information become available, and updates to the cumulative assessment undertaken, the Applicant will review the need for any additional mitigation for Mona.</p> <p>The Applicant would note that the CEA is based on assumptions, particularly with respect to the delivery programme of other projects assessed. The Applicant has regular meetings with NGET and other developers connecting into Bodelwyddan in order to understand how the respective projects will be brought forward, The Applicant will keep working with those other parties as all projects progress through the development and construction phases, and will look to understand where interactions may occur and how they may be managed.</p> <p>The Applicant notes the request for a more strategic approach to infrastructure in the area. As the developer of just one of those projects the Applicant is not in a position, and doesn't have the remit, to provide this, and sees this as the responsibility of the Local Authority or other relevant organisations to bring forward. The Applicant would be happy to meet with the Local Authority on this matter, though notes that the timing of future strategic planning would need to account for the current status of Mona in development.</p> <p>As the Applicant noted during ISH1 (REP1-009) the Applicant is working with the Local Authorities to provide support to them where they currently lack specialist technical resource. The Applicant can confirm they have also had meetings with Net Zero Industry Wales regarding the potential for longer term support and will continue to have these discussions. The Applicant would also point to paragraph 6 of Schedule 12 of the dDCO (C1 F04) regarding payment of fees for the discharge of requirements.</p>

MONA OFFSHORE WIND PROJECT

2.2 Cadw

Table 2.2: Cadw

Reference	Written Submission Comment	Applicant's response
REP1-052.23	<p>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.</p>	<p>Thank you for providing Written Representation to the Examination of the Mona Offshore Wind Farm Project at Deadline 1. The Applicant notes your response and provides comments against the relevant points below.</p>
REP1-052.24	<p>Scheduled Monuments and Non-Designated Archaeological Sites Onshore</p> <p>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.</p> <p>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</p>	<p>The Applicant notes Cadw's response. The Applicant has engaged with Cadw to confirm matters of agreement and has specifically agreed that sufficient data has been collated to characterise the baseline environment. This agreement has been captured in the Statement of Common Ground (REP1-034) The programme of archaeological evaluation will be completed in September 2024. The Outline Onshore Written Scheme of Investigation (J23 F02) will be updated following completion of the programme of trial trenching.</p>



**MONA OFFSHORE WIND PROJECT**

	<p>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.</p> <p>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.</p> <p>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.</p>	
<p>REP1-052.25</p>	<p>Offshore</p> <p>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.</p> <p>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</p>	<p>The Applicant notes Cadw's response.</p> <p>In relation to Marine Archaeology, the Applicant notes that Cadw accept that the assessments carried out to date and the measures set out in the Outline Offshore Written Scheme of Investigation and Protocol of Discoveries (WSI and PAD) (APP-204) are appropriate. This is reflected in the initial Statement of Common Ground (SoCG) prepared by the Applicant and Cadw (REP1-034). The Applicant confirms that the Royal Commission on the Ancient and Historic Monuments of Wales (RCAHMW) have been consulted throughout the pre-application consultation. RCAHMW submitted a Written representation at Deadline 1 (REP1-073) which requested that the Applicant update the Outline Offshore WSI and PAD (APP-204) to refer to RCAHMW as an archaeological curator in line with their comments. The Applicant has made</p>

**MONA OFFSHORE WIND PROJECT**

	<p>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.</p> <p>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.</p>	<p>these revisions in the updated in the updated Outline Offshore WSI and PAD submitted at Deadline 2 (J18 F02).</p>
<p>REP1-052.26</p>	<p>Registered Historic Parks and Gardens Onshore</p> <p>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</p>	<p>The Applicant notes Cadw's response.</p>



**MONA OFFSHORE WIND PROJECT**

	<p>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.</p>	
REP1-052.27	<p>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</p>	The Applicant notes Cadw's response.
REP1-052.28	<p>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</p>	The Applicant notes Cadw's response.
REP1-052.29	<p>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</p>	The Applicant notes Cadw's response.

**MONA OFFSHORE WIND PROJECT**

	<p>significant effects on these registered historic landscapes. I concur with this conclusion.</p>	
<p>REP1-052.30</p>	<p>Listed Buildings The proposed cable route will be horizontally directional drilled underneath listed building 199044 Gwyrch Estate Boundary Wall from Tan-yr-Ogof to Gwyrch 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.</p> <p>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.</p> <p>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</p>	<p>The Applicant notes Cadw's response.</p>

**MONA OFFSHORE WIND PROJECT**

	<p>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 Wyrch                  19039 - Hen Wyrch 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 &amp; Outbuildings to Staverton &amp; Southcroft                  19036 Lady Eleanor's Tower.                  19924 - Church of St Mary.                  Mitigation measures including landscaping and tree planting will reduce these affects to negligible to no change inside 15 years. I concur with this conclusion.</p>	
<p>REP1-052.31</p>	<p>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</p>	<p>The Applicant notes Cadw's response.</p>

**MONA OFFSHORE WIND PROJECT**

	<p>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 Condoover 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</p>	
<p>REP1-052.32</p>	<p>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.</p>	<p>The Applicant notes Cadw's response.</p>
<p>REP1-052.33</p>	<p>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</p>	<p>The Applicant notes Cadw's response and looks forward to continued engagement as the Examination of the Mona Offshore Wind Project progresses.</p>

## MONA OFFSHORE WIND PROJECT

---

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

---