



SHEPHERD+ WEDDERBURN

SUMMARY OF POST-HEARING WRITTEN SUBMISSIONS ON BEHALF OF

(1) BARROW OFFSHORE WIND LIMITED (REF: 20048546) (2) BURBO EXTENSION LTD (REF: 20048544) (3) WALNEY EXTENSION LIMITED (REF: 20048542) (4) MORECAMBE WIND LIMITED (REF: 20048547) (5) WALNEY (UK) OFFSHORE WINDFARMS LIMITED (REF: 20048545) (6) ØRSTED BURBO (UK) LIMITED (REF: 20048543) (THE "ØRSTED IPs")

IN CONNECTION WITH THE Application by Mona Offshore Wind Limited for an Order Granting Development Consent for the Mona Offshore Wind Farm

## **1. Introduction**

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- 1.1 This summary of post-hearing written submissions is provided by the Ørsted IPs<sup>1</sup> in accordance with DL4 of the examination of the application by Mona Offshore Wind Farm Limited (the “**Applicant**”) for an Order under the Planning Act 2008 granting Development Consent for the Mona Offshore Wind Farm (the “**Project**”).

## **2. Summary of post-hearing written submissions regarding energy yield**

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- 2.1 In refusing to carry out an assessment of the wake effects of the Project on the Ørsted IP developments, the Applicant has failed to comply with important requirements of the policy and legal framework applying to the Project.
- 2.2 The framework requires an assessment of effects of offshore wind development on close operational infrastructure. Contrary to the Applicant’s submissions, the Ørsted IPs developments qualify as “*close*” to the Project given their potential to be adversely affected. The potential adverse effects are borne out both in academic research and through preliminary modelling commissioned by the Ørsted IPs.
- 2.3 As a result of the Applicant’s failure to carry out such an assessment:
- 2.3.1 the SoS cannot be satisfied that site selection and design has been made to avoid/minimise disruption/economic loss to other industry (as required by the NPS-EN3);
  - 2.3.2 the Applicant has failed to comply with policy SAF-01 of the Welsh National Marine Plan, which requires proposals to demonstrate compatibility with existing activity;
  - 2.3.3 the Applicant’s EIA assessment of the climate change benefits of the Project is inaccurate, because the potential loss of renewable generation at the Ørsted IP developments is not accounted for.
- 2.4 Finally, the Ørsted IPs note that the wake effects of the Project are capable of being modelled.

**Shepherd & Wedderburn LLP**

**04.11.2024**

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<sup>1</sup> As described in relevant representations [RR-004], [RR-007], [RR-047], [RR-087], [RR-088] and [RR-090].