

# MONA OFFSHORE WIND PROJECT

## Response to Richard Fearnall on behalf of Michael and Sally Leach ExQ1 Responses

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Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

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**MONA OFFSHORE WIND PROJECT**

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## 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,

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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.

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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
WTW	Wildlife Trust Wales
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 Richard Fearnall on behalf of Michael and Sally Leach ExQ1 Responses**

## **1.1 Introduction**

- 1.1.1.1 This document has been prepared by the Applicant in response to the submissions received from Richard Fearnall, on behalf of Michael and Sally Leach.
- 1.1.1.2 The Applicant has provided a response to these submissions in the table below and the reference numbers cited refer to the Planning Inspectorate's Examination Library for the DCO relating to the Mona Offshore Wind Project.
- 1.1.1.3 References to numbered plots are references to plot numbers in the Book of Reference (document reference AS-015).

## 2 Response to Richard Fearnall on behalf of Michael and Sally Leach ExQ1 Responses

Table 2.1: REP3-113 - Richard Fearnall on behalf of Michael and Sally Leach

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Richard Fearnall on behalf of Michael and Sally Leach response	Applicant's response
REP3-113.1	Michael and Sally Leach, Mr and Mrs JT Owen	<p>Q1.1.6 Dust</p> <p>In [PDA-008], pages 242 &amp; 252 the Applicant highlighted its proposals for mitigating the potential impacts of dust and submitted an updated ODMP at Deadline 2 [REP2-042]. If you consider these proposals to be inadequate, can you advise how they need to be supplemented?</p>	<p>Appendix 214 [PDA-008] states there will be a dust management plan. There are no further details on what any of the methods of mitigation are or how these will be implemented and monitored. The ODMP identifies a number of receptors within 350 meters of the proposed works as being potentially affected. Nant Ganol is approximately 115 meters from the Wilson Fearnall Ltd scheme and is a residential dwelling likely to be more sensitive to this type of disturbance. Dust has been identified as the key pollutant from the construction phase of the Project in 1.8.8.2 of the Non-Technical summary.</p> <p>Nant Ganol lies immediately adjacent to the potential haul road, 2 HDD locations and a road crossing and is highly likely to be impacted by all the construction activities. As no new land rights are required by the project over Nant Ganol, Mr and Mrs Leach are not Category 1 landowners so do not receive the same level of statutory protection against disturbance as other property owners who have land affected but are located further away from the main construction activities.</p> <p>It is requested that the project undertakes further engagement with Mr and Mrs Leach to:</p> <ul style="list-style-type: none"> <li>Provide details and assurances of the specific dust mitigation measures that will be implemented for the benefit and protection of Nant Ganol.</li> </ul> <p>Provide an assurance that Rule 6 of Section 5 of the Land Compensation Act 1961 and Section 7 of the Compulsory Purchase Act 1965 will apply to the owners of Nant Ganol in respect of any impacts arising from the project. This will ensure the owners of Nant Ganol would have a route to reasonable and fair compensation should mitigation not be sufficient.</p>	<p>In the event of effects as a result of noise, dust or vibration as a direct result of the project, Mr and Mrs Leach may be entitled to make a relevant claim as defined in section 57(6) of the Planning Act 2008. A relevant claim is a claim under section 10 of the Compulsory Purchase Act 1965, a claim under part 1 of the Land Compensation Act 1973, or a claim under section 152(3) of the Planning Act 2008. The Applicant confirms that any compensation claim will be appropriately assessed in accordance with the applicable legal framework and valuation principles.</p> <p>As set out in paragraph 1.8 of the Outline Dust Management Plan (REP2-042), additional mitigation and control measures have been proposed to reduce nuisance dust effects at the nearest receptors should the identified trigger levels be exceeded.</p>
REP3-113.2	Michael & Sally Leach, Mr & Mrs JT Owen	<p>Q1.2.2 In [PDA-008], pages 242 &amp; 255, the Applicant identified proposed measures associated with soil storage and management and submitted an updated Outline Soil Management Plan at Deadline 2 [REP2-054]. If you consider these proposals to be inadequate, can you advise how they need to be supplemented?</p>	<p>The proposals are considered adequate.</p>	<p>The Applicant notes this response.</p>
REP3-113.3	Michael & Sally Leach	<p>Q1.2.3 In [REP2-078], REP1-087.3, 4, 5 &amp; 6, the Applicant responded to your submissions about: • the Proposed Development's potential impact on your property's existing utility and private service media; and • perceived lack of detail in submitted documentation and in respect of specified elements of the proposed works. With reasoning for your conclusion, does this address your concerns?</p>	<p>Insufficient detail has been provided regarding the timing, methods or location of the various elements of the project to allow a detailed impact assessment on Nant Ganol. Nant Ganol is a residential dwelling near the boundary of the scheme – it is significantly closer than most other impacted dwellings. We have concerns regarding the location and use of the haul road, the extent of HDD works in two locations adjacent to Nant Ganol and the temporary road crossing. We have still not received any assurance and detail regarding how the mains water connection to Nant Ganol will be provided during works, and the route of any long-term diversion, should this be required.</p> <p>It is requested that the project undertakes further engagement with Mr and Mrs Leach to:</p>	<p>As set out in the responses in REP2-078, impacts to private water supplies are considered in Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment of the Environmental Statement (APP-116). The hydrogeological risk assessment confirms the qualitative risk rating for the private water supplies (PWS) identified together with recommended mitigations.</p> <p>Discussions with landowners will be undertaken at the detailed design stage to confirm the precise location of private water supplies and the project team will similarly engage and communicate with affected parties on requirements and timings concerning proposed works.</p> <p>Prior to any construction activities, utility surveys will be undertaken to establish if any infrastructure is present prior to any intrusive work being undertaken. The Mitigation and Monitoring</p>

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Richard Fearnall on behalf of Michael and Sally Leach response	Applicant's response
			<ul style="list-style-type: none"> <li>Provide details and assurances of the construction methods, timings and mitigation measures to be implemented proximate to Nant Ganol for the benefit and protection of the property and its inhabitants.</li> </ul> <p>Provide an assurance that Rule 6 of Section 5 of the Land Compensation Act 1961 and Section 7 of the Compulsory Purchase Act 1965 will apply to the owners of Nant Ganol in respect of any impacts arising from the project. This will ensure the owners of Nant Ganol would have a route to reasonable and fair compensation should mitigation not be sufficient. The project has acknowledged the Mr and Mrs Leach are protected by Section 10 of the Land Compensation Act 1965, but this is wholly insufficient given the levels and types of disturbance that Nant Ganol will suffer because of the project.</p>	<p>Schedule (reference number 41, REP3-012) confirms that the development and implementation of mitigation measures for private water groundwater supply sources would be based on a hierarchy set out in the detailed Code of Construction Practice which is secured by Requirement 9 of Schedule 2 of the draft Development Consent Order (PDA-003).</p> <p>Any losses or disturbance as a direct result of the works may be compensated for in accordance with the applicable provisions of the compensation code principles relating to compulsory purchase, arising from section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 or section 152(3) of the Planning Act 2008 following the substantiation of evidence, All attempts will be made to ensure disturbance is mitigated by both the Applicant and Mr and Mrs Leach to ensure the water supply is maintained in accordance with the provisions set out above and similarly of other effects.</p>
REP3-113.4	Michael & Sally Leach	Q1.6.29 In its Response to Written Representations ([REP2-078], REP1-087.1) the Applicant responded to your submission about compensation. With reasoning for your conclusion, does this address your concerns?	<p>In the applicant's response to REP1-087.1, Mr and Mrs Leach are incorrectly referred to as Category 3 parties, but within the Book of Reference they are correctly identified as Category 2 parties.</p> <p>Under the proposed DCO Mr and Mrs Leach's' only statutory route to protection arises from any interference with their rights across adjacent land for a mains water connection. The limited protection under Section 10 of the Land Compensation Act 1965, is wholly insufficient given the levels and types of disturbance that Nant Ganol will suffer because of its proximity to the project which is clearly illustrated in Figures 1.27 to 1.34 of the Environmental Statement - Volume 7, Annex 9.2: Construction Noise and Vibration Technical Report.</p> <p>As set out above, it is considered fair and reasonable that the project provides equivalent protections to Mr and Mrs Leach that would be enjoyed by a Category 1 party under relevant statute. It is requested that the project undertakes further engagement with Mr and Mrs Leach to:</p> <ul style="list-style-type: none"> <li>Provide details and assurances of the construction methods, timings and mitigation measures to be implemented proximate to Nant Ganol for the benefit and protection of the property and its inhabitants.</li> </ul> <p>Provide an assurance that Rule 6 of Section 5 of the Land Compensation Act 1961 and Section 7 of the Compulsory Purchase Act 1965 will apply to the owners of Nant Ganol in respect of any impacts arising from the project.</p>	<p>Mr and Mrs Leach are listed as a Part 1 Category 2 interest and also as a Part 2 interest in the Book of Reference (REP2-008) against plots 04-074, 04-076 and 04-077 "in respect of right of access to relay and maintain pipes and supply of waterways contained in a transfer dated 7 June 1996". In the event there is physical interference with these rights, Mr and Mrs Leach may be able to make a relevant claim for losses arising by execution of the works, or caused by the use and operation of the works, as set out below.</p> <p>In the event of effects as a result of noise, dust or vibration as a direct result of the project, Mr and Mrs Leach may be entitled to make a relevant claim as defined in section 57(6) of the 2008 Act. A relevant claim is a claim under section 10 of the Compulsory Purchase Act 1965, a claim under Part 1 of the Land Compensation Act 1973, or a claim under section 152(3) of the Planning Act 2008 . As set out in the D2 Funding Statement Annexes Part 1 (APP-026), allowance has been made for such claims by the project, but it is anticipated that through detailed design, further refinement and adhering to the Code of Construction Practice, impacts shall be mitigated to a level that would not give rise to such a claim. The Applicant confirms that any compensation claim will be appropriately assessed in accordance with the applicable legal framework and valuation principles</p> <p>The Outline Construction Noise and Vibration Management Plan (J26.3 F03) includes measures set out within Table 1.1 with examples on how mitigation measures in relation to noise and vibration will be managed through the works, some of these measures include localised acoustic screening to prevent any line of sight between the noise source and the property. These measures will be defined as the detailed design progresses and will be agreed with the relevant local authority via the final Construction Noise and Vibration Management Plan.</p>
REP3-113.5	Michael & Sally Leach	Q1.8.3 In its Response to WRs ([REP2-078], REP1-087.2) the Applicant addressed your submission about the Proposed Development's potential impact on your	The mains water connection to Nant Ganol will be directly impacted by the scheme. Mr and Mrs Leach have not been provided with any formal assurance that there will be no long-term outage of or disturbance to this service.	The Applicant refers to section 1.6.2 of the Outline Onshore Construction Method Statement on its approach to crossing utilities (REP2-068), all utility crossing including water mains will be

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Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Richard Fearnall on behalf of Michael and Sally Leach response	Applicant's response
		property's water supply. With reasoning for your conclusion, does this address your concerns?	In addition to an assurance that the additional statutory compensation protections are included as set out above, it is requested that the project undertakes to maintain all existing services to Nant Ganol or to provide suitable alternatives at their own cost.	crossed in accordance with standards agreed with the utility owner/operator. A water main in the vicinity of Nant Ganol has been identified in the Onshore Crossing Schedule (REP1-007) (Obstacle ID S2-UUX-2, Mapping ID 54). This water main will be crossed using a trenchless technique to minimise impacts.
REP3-113.6	Michael & Sally Leach	Q1.12.4 In its Response to RRs ([PDA-008], pages 243 & 256) the Applicant highlighted its proposals for management or diversion of footpaths and PRowS, and at Deadline 2 submitted an updated Outline Public Rights of Way Management Strategy [REP2-070]. If you consider these proposals to be inadequate, can you advise how they need to be supplemented and identify any routes that are of particular concern?	No further concerns.	The Applicant notes this response.
REP3-113.7	Michael & Sally Leach, Mr & Mrs JT Owen	Q1.16.1 In its Response to Relevant Representations ([PDA-008], pages 242, 243, 255 & 256) the Applicant signposted its assessment of noise and vibration and highlighted its associated mitigation proposals. This was supplemented by submission of a revised Outline Construction Noise and Vibration Management Plan [REP2-044]. If you consider the assessment and proposed mitigation to be inadequate, can you advise how they need to be revised or supplemented?	As outlined above, the Outline Construction Noise and Vibration Management Plan does not provide sufficient information on mitigation at Nant Ganol. Figures 1.27 to 1.34 of the Environmental Statement - Volume 7, Annex 9.2: Construction Noise and Vibration Technical Report clearly illustrates that there will be a significant impact at Nant Ganol. It is requested that the project undertakes further engagement with Mr and Mrs Leach to: <ul style="list-style-type: none"> <li>• Provide details and assurances of the construction methods, timings and mitigation measures to be implemented proximate to Nant Ganol for the benefit and protection of the property and its inhabitants.</li> <li>• Provide an assurance that Rule 6 of Section 5 of the Land Compensation Act 1961 and Section 7 of the Compulsory Purchase Act 1965 will apply to the owners of Nant Ganol in respect of any impacts arising from the project.</li> </ul>	The Applicant refers to its response at REP3-113.4 The Applicant confirms that the Outline Construction Noise and Vibration Management Plan [J26.3 F03] includes general measures to mitigate noise and vibration impacts from construction activities. At this stage, specific construction plant, methods, timings and mitigation to be used during the construction phase of the project are not yet fully defined. However, the Applicant confirms that during the detailed design phase of the project, specific mitigation measures will be developed and these will be included in the final Construction Noise and Vibration Management Plan which will be submitted to the relevant local authorities for approval.