

MONA OFFSHORE WIND PROJECT

Response to The Executors of the Late Sir David Watkin Williams-Wynn BT ExQ1 Responses

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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MONA OFFSHORE WIND PROJECT

Contents

RESPONSE TO THE EXECUTORS OF THE LATE SIR DAVID WATKIN WILLIAMS-WYNN BT EXQ1 RESPONSES..... 1

1 RESPONSE TO THE EXECUTORS OF THE LATE SIR DAVID WATKIN WILLIAMS-WYNN BT. EXQ1 RESPONSES..... 1

 1.1 Introduction 1

2 RESPONSE TO THE EXECUTORS OF THE LATE SIR DAVID WATKIN WILLIAMS-WYNN 2

Tables

Table 2.1: REP3-117 - Executors of the Late Sir David Watkin Williams-Wynn 2

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

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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 ²	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles
μT	Microtesla

1 Response to The Executors of the Late Sir David Watkin Williams-Wynn BT. ExQ1 Responses

1.1 Introduction

1.1.1.1 The Applicant has responded to The Executors of the Late Sir David Watkin Williams-Wynn below.

2 Response to the Executors of the Late Sir David Watkin Williams-Wynn

Table 2.1: REP3-117 - Executors of the Late Sir David Watkin Williams-Wynn

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Executors of the Late Sir David Watkin Williams-Wynn response	Applicant's response
REP3-117.1	NFU Davis Meade Property Consultants The Executors of the Late Sir David Watkin Williams-Wynn. Bt. Mr & Mrs JT Owen Any AP	Q1.6.16 Policy context Do paragraphs 2.6.4 and 2.6.5 of NPS EN-5 provide policy support for the Applicant's approach to the compulsory acquisition of land?	The Applicant has not fully explained the change in approach as there is clear evidence which supports a leasehold acquisition of the site (this has been accepted on other schemes). Nor have they specifically explained why a freehold approach is absolutely required in this instance.	Powers in the Planning Act 2008 apply the longstanding compulsory purchase regime legislation through the Compulsory Purchase Act 1965 and Acquisition of Land Act 1981 (s125 PA). It is not possible for the Applicant to seek rights for a term of years under the current compulsory acquisition legislation which is why freehold acquisition is required of the land needed for the substation and related works.
REP3-117.2	The Executors of the Late Sir David Watkin Williams-Wynn. Bt	Q1.6.23 Clarification In your WR [REP1-091] you referred to other schemes where acquisition of land within your ownership was by lease; what NSIPs are you referring to?	There are three existing NSIP substations, which are all located on the same landowners property. All three, are occupied by way of separate leasehold arrangements, on differing commercial terms. The leaseholders being National Grid, Gwynt y Mor (RWE), and Dong Energy (now Orsted) are located approximately 500 to 800 meters from the Applicant's preferred site location. Further more National Grid as part of the wider RWE Awel y Mor development have agreed to the existing 400kv substation extension on a lease to match the existing even though a DCO is to be progressed. Therefore there is no reason why acquisition of the freehold is necessary in this instance.	The Applicant is aware that the three existing substations were agreed on leasehold arrangements through a voluntary negotiation. As set out above, a long term leasehold cannot be secured under the DCO and therefore freehold acquisition is being sought where rights in land will not be sufficient for the operation of the substation and associated works.
REP3-117.3	The Executors of the Late Sir David Watkin Williams-Wynn. Bt	Q1.6.24 Alternatives In your RR [RR-082] you refer to 'other sensible alternatives' for the proposed access route. Can you show these on a map or plan?	The proposed operational land take completely dissects this Estate and tenanted holdings impacting contiguity. Alternative accesses (plan to follow), could be obtained from the North making use of the existing NCIP infrastructure or the South, and there are alternative locations which would be preferable to the Landowner for the site as a whole (which would have considerably less overall impact). The Applicant has failed to actively address and consider in dialogue with the Landowner any of the alternative routes. One site (site1) lies to the east of the proposed location and has direct access to the highway, lies on the extremities of the Estate and has significantly less impact on the Estate and its tenants. According to the BP reports has the same characteristics save the National Grid proximity.	The Applicant has undertaken a rigorous and robust site selection process in relation to the proposed access route to the onshore substation for the Mona Offshore Wind Project. The Preliminary Environmental Information Report provided indicative onshore substation access options in Figure 3.2 of the Project Description. Consideration of alternatives for the onshore substation access route are discussed in Section 4.11.7 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051). This is also supported by Section 1.4.4 of Volume 5, Annex 4.2: Site Selection BRAG Report (APP-082). Six potential options were considered for the onshore substation operational access route once the onshore substation site was selected. The selected operational access route makes use of the existing National Grid operational access, the new access is screened by existing woodland and infrastructure, crosses no other public highways (in comparison to other options) and directs cumulative traffic movements away from the Awel y Mor Offshore Wind Farm onshore substation access. LSS Access 4 considered using the entirety of the National Grid operational access but was discounted ('Black' in the Site Selection BRAG Report (APP-082)) due to a lack of feasible space associated with proposed and existing infrastructure, the existing drainage and the proposed realignment of the high-pressure gas main associated with the extension of the National Grid substation. Access to the south was discounted due to the width of the existing public highway carriage not being suitable for Heavy Goods Vehicles and works to widen the carriage would not be proportionate when alternatives are available.

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				<p>The Applicant notes that the landowner feedback received following the non-statutory consultation was that the onshore substation preferred sites were Option 2 and Option 7. During a meeting with the landowner's agent on 13th September 2022, the seven onshore substation options were shown to the agent where feedback was requested. Option 2 and 7 were identified as preferable as these were sited away from the proposed solar farm development. These were the sites that were progressed for statutory consultation via the Preliminary Environmental Information Report.</p> <p>The Applicant notes the landowner's reconsideration of onshore substation Option 1 (as outlined in the shortlist for non-statutory consultation in Autumn 2022). The Applicant also reminds the landowner that feedback received following the non-statutory consultation was that the onshore substation should not be located on the site of the St Asaph Solar Farm as defined in the EIA Screening Report submitted by the developer Anesco in May 2022 (case reference CAS-01392-D2T3F3). This was the primary reason that Option 1 was discounted from the onshore substation site selection process.</p>
REP3-117.4	The Executors of the Late Sir David Watkin Williams-Wynn. Bt	<p>Q1.6.25 Update</p> <ul style="list-style-type: none"> To what extent does the Applicant's response ([PDA-008], pages 334-339 and [REP2-078] to the matters you raised in your RR ([RR-082] and WR [REP1-091] address your concerns? Can you provide an update on negotiations with the Applicant? 	<p>The Applicant's response does not accurately reflect progress to date. The Applicant has never precisely outlined what they propose to deliver and how they intend to secure it. The meetings had between the Applicant and Landowner have always been in the context of access to land (and not the eventual acquisition). The Landowner has never been supplied with any indicative designs, or were led to believe they had any input at all. Efforts were made early to understand the land take, but responses were received on the basis the Applicant's agent did not have the information required. Initial communications, from the Applicant, related to survey notices and it was not until later down the line that any information about what land and rights the Applicant sought, was provided.</p> <p>The Applicant has not specifically addressed the access route point, their response focuses solely on the site selection. We have provided sites in response to the question above which will be more suitable and will have less of an impact on the Estate.</p> <p>Regarding the impact of the electromagnetic fields, the Applicant has not demonstrated how they will comply with internationally recognised guidance. Nor have they confirmed what action, process and technical and protective measures will be implemented (and what stage this will happen). The Landowner would request that the Applicant provides reports of monitoring post completion. As well as details on how and what recourse will be taken for failure to comply with guidelines.</p> <p>The response to our comments on how the non-contiguous nature of the substation affects the deer population is not sufficient and does not demonstrate how the deer population will or can be protected.</p> <p>In terms of the negotiations, the Landowner has been seeking to arrange a meeting with the Applicant since August and have been unable to find suitable dates so far. However, they are hopeful that an initial date may be fixed for October.</p>	<p>Dalcour Maclaren on behalf of the Applicant have sought to engage with the representatives of the executors of the Late Sir David Watkin Williams Wynn BT through the non-statutory consultation in June 2022 and September 2022 and then further through the formal consultation in April 2023. The latter was extended by 40 days for the representatives of the Estate at the project's discretion to allow further time for them to submit a response given matters out of their control affecting their ability to respond.</p> <p>Throughout the above timeframe the Applicant has sought to meet with the Estate and have requested numerous meetings to further discuss the impact on them. A virtual meeting took place on 13th September 2022 where the Estate made the Applicant aware of their future development plans for the St Asaph Solar Farm. Plans were shared, and the Applicant made amendments to their proposals. Since that meeting in September 2022, another virtual meeting was held with the estate and their legal representative on the 17th April 2023, where the Applicant confirmed that onshore substation Option 2 and Option 7 were being taken forward to statutory consultation.</p> <p>A meeting with the Estate's representatives was arranged in August 2023 to discuss the sites and provide further clarity on the site selection process and land rights being sought, however the meeting was cancelled by the Estate's representatives. The Applicant has been unable to meet with the Estate and their agent due to meetings being refused or postponed, however the Applicant has provided information regarding the project proposals on multiple occasions throughout the development of the project in hope for engagement.</p> <p>Given the Applicant's wish to progress discussions, Heads of Terms setting out the main clauses and the land rights being sought, along with accompanying plans, were issued to the Estates' representatives on 29th February 2024, with the hope that engagement would be forthcoming to further those discussions in detail.</p>

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Executors of the Late Sir David Watkin Williams-Wynn response	Applicant's response
				<p>The Applicant refers to its response at REP3-117.3 regarding the onshore substation access road.</p> <p>The Applicant refers to its response at REP3-117.5 regarding electromagnetic fields.</p> <p>It is noted within the Outline Landscape and Ecology Management plan (REP2-034) that all the sites identified for natural colonisation will be protected using deer fencing. This fencing will be suitable for the exclusion of fallow and roe deer that are known to be found locally and therefore ongoing management of the deer in conjunction with the Estate would be welcomed by the Applicant.</p> <p>The Applicant will continue to seek engagement with the Estate regarding the deer population and to obtain an understanding of how impacts can be mitigated and how the deer population can continue to be managed along with other agricultural and estate operations.</p> <p>A meeting had been arranged for the 21st October 2024, however it was cancelled by the representatives of the Estate. The Applicant is now due to meet with the Estate on the 11th November during which it is hoped that it will be possible to discuss the project in greater detail and understand how the Onshore Substation and its associated land requirements can coexist with the wider estate, including the management of the deer population.</p>
REP3-117.5	The Executors of the Late Sir David Watkin Williams-Wynn. Bt.	<p>Q1.1.3 Electro-Magnetic Fields (EMFs)</p> <p>The Applicant addressed comments in your RR [RR-082] about the potential impact of EMFs in [PDA-008], page 173. In Section 4.2 of ES Chapter 4 (Vol 4) [APP-078] it signposted the proposal's potential impact on human health had been assessed against the prevailing legislative and policy context and specifically addressed the perception of risk for EMF (radiation), both individually and cumulatively, at Sections 4.8.8 and 4.10.8 respectively. In light of that, and the WR from Public Health Wales [REP1- 058], does that address you concerns? If not, please explain why.</p>	<p>Page 173 merely states that the Applicant will engage with the HSE, and that HSC is likely to be required. The Landowner does not see how that addresses our concerns. The Landowner is also unsure how "signposting" could be considered sufficient to address concerns of this nature.</p> <p>No evidence has been provided to support the Applicant's claim. Nor is it clear, from what has been provided, to what extent has the Applicant considered other NCIPS in the vicinity and the cumulative impact this will have.</p> <p>In respect of the baseline, the Applicant has not addressed whether expert surveys been carried out to evidence the current fields and taken a model exercise to consider the potential uplift if fields</p> <p>In terms of the BAT, the Applicant has not addressed what the proposed techniques are and how they will mitigate the issues and concerns raised. In addition how will they address any future developments which may exacerbate the status quo.</p> <p>The presence of the Substations and Converter Station could lead to private development loss as the EMF levels will have been reached. This prevent future Estate opportunities which is a significant impact.</p> <p>The cable route is HVDC and when spaced several meters apart, a rise in EMF and EMI is caused. The Landowner has seen no demonstration as to how the Applicant will be below the reference levels of people throughout the route on the Estate. Will any post construction and commissioning EMF and EMI testing be carried out to verify the fields as presented in the assessment / design to ensure compliance to the guidelines will be adhered to, and can the Landowner have sight of these proposals.</p>	<p>The Mona Offshore Wind Project will adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and the Government's voluntary Code of Practice (Table 4.19 of Volume 4, Chapter 4 of the Environmental Statement (APP-078)). This is standard practice for the electricity industry.</p> <p>Electricity substations do not produce a significant external electric field, but they do produce a magnetic field. This is measured in microtesla (μT). Large substations, such as the proposed Mona Onshore Substation do not produce very large magnetic fields themselves (generally less than $1 \mu T$). The magnetic fields fall rapidly with distance, and within 1 to 2 metres from a substation, the magnetic fields associated with it are usually indistinguishable from other fields present in homes. The security fence around the perimeter of the Onshore Substation will limit access to the areas where higher fields may be expected, and the proposed landscaping and ecological mitigation areas around the Onshore Substation will provide a further buffer. High-voltage underground cables can produce higher magnetic fields directly above them, however the magnetic field falls rapidly with distance to the sides, and they produce no external electric field (Energy Networks Association, 2012). As the magnetic fields reduce to levels commonly experienced in the wider environment within a small distance from the infrastructure, there is no anticipated cumulative effect from EMF.</p> <p>There is no restriction on EMF grounds on how close houses can be constructed in proximity to substations. The UK Government has not adopted corridors around power lines prohibiting housing developments as it was seen as disproportionate in the light of the evidence base on the potential health risks arising from exposure to ELF EMF (Government response to the Stakeholder Advisory Group on extremely low frequency electric and magnetic fields (ELF EMFs) (SAGE) recommendations, 2009). Therefore, with the</p>

MONA OFFSHORE WIND PROJECT

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				exception of the permanent rights and freehold acquisition required for the Applicant's infrastructure, the Estate will be able to develop the remainder of their estate as they wish subject to securing any necessary consents or approvals.