

MONA OFFSHORE WIND PROJECT

Response to Cefn Meiriadog Community Council Deadline 4 Submissions

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Image of an offshore wind farm

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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).

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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

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Units

Unit	Description
GW	Gigawatt
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 Response to Cefn Meiriadog Community Council Deadline 4 Submissions

1.1 Introduction

1.1.1.1 The Applicant has responded to Cefn Meiriadog's Deadline 4 submissions below.

2 Response to Cefn Meiriadog Community Council ISH3 Post Hearing Submission

Table 2.1: REP4-094 - Cefn Meiriadog Community Council

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-094.1	<p>(1) Oral submissions put at ISH3</p> <p>1.1 Cefn Meiriadog Community Council (CMCC/'The Council') has previously expressed concern about the proposed inclusion in the design of the onshore substation of twelve 30-metre high lightning conductor masts, an element of the design that was excluded from the Applicant's Landscape Visual Impact Assessment (LVIA). The Council contends that such a grid of twelve masts would of necessity be one of the dominating visual features of substation's presence in the landscape, especially when experienced by those living in, working in, passing through or engaging in recreational activities in the vicinity of the site. However, while it was included in a revised LVIA, this found it made no difference to the landscape/visual impact assessment as compared with the original assessment. This conclusion CMCC finds to be counterintuitive and to defy common sense.</p>	The Applicant refers to its ISH3 Hearing Summary (REP4-032), paragraph 40.
REP4-094.2	1.2 It has been noted that none of the four existing and consented large-scale substations located within Cefn Meiriadog has a grid of lightning masts of this nature.	
REP4-094.3	1.3 The Council noted with particular interest therefore that, having alluded to the matter in similar terms to those present at the Accompanied Site Inspections the previous day, at the Hearing the Applicant's representative stated that this was only one of several possible solutions that would be considered for the final design. It was suggested that the proposal for a grid of twelve masts was the product of the 'worst-case scenario' philosophy informing the substation's initial design.	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-094.4	1.4 CMCC requests, therefore, that on the basis of the other four substations not having needed to adopt this solution, the Applicant be required to exclude it from the substation's design.	
REP4-094.5	1.5 The issue of working hours was discussed at ISH3 and the Applicant's request for 7am-7pm working day was restated. It is noted that this excludes an hour for mobilisation either side of the starting and finishing times, in effect making for a 6am to 8pm exposure to construction-related noise and activity for residents.	The Applicant refers to its ISH3 Hearing Summary (REP4-032), paragraph 56.
REP4-094.6	1.6 While the Applicant contends that 7am-7pm working is preferred by residents, and that anything less would impede their adherence to their preferred timetable, the Council has previously called for 8am-6pm working (therefore 7am-7pm including mobilisation), this being backed unanimously by an (albeit rudimentary) poll conducted on social media.	
REP4-094.7	1.7 It was pointed out that a precedent has been set by Awel y Môr's working hours having been consented at 7am-7pm. In CMCC's view, however, this is all the more reason for Mona's working hours to be set at 8am-6pm, in order to offset the impacts of the two projects being undertaken concurrently, and the certainty that the National Grid extension construction must also run concurrently with these, since the extension is required to accommodate the additional energy generated by the Mona project.	
REP4-094.8	1.8 CMCC requests, therefore, that for the well-being of residents, working hours be set at 8am-6pm (8am-1pm Saturdays).	
REP4-094.9	<p>(2) Hearing Action Points</p> <p>2.1 Response to Action 15: 'With reference to NPS EN-1 para 4.3.19, is it possible that even if considered acceptable in their own right with mitigation measures in place, the</p>	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	<p>various effects arising as a result of the onshore substation could add up to have a significant effect on the community or the environment either as a result of the project alone or cumulatively with other proposed developments?' [4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.]</p>	
<p>REP4-094.10</p>	<p>2.2 In its previous submissions, CMCC has stated at length and in detail the significant effects on the community and the environment which this project will of necessity have. Its point is that locating a 65,000 sq. m. substation in a rural agricultural landscape of settled character, with the community it is home to taking its identity from that character and landscape, cannot but have a major detrimental impact on the landscape, the community, and the individual residents making up that community. This applies to both construction and operational phases, and there is little that any proposed mitigation can do to offset the sheer scale of the effect the project will have on residents' lives and the community's future.</p>	
<p>REP4-094.11</p>	<p>2.3 Given that if consented this would be the fifth very large-scale infrastructure project, all of which are substations, in a community of 5 square miles and 359 people, the conclusion is inescapable that the effects of the project will amplify and be amplified by the visual and other impacts of the other four projects in such a small area. It is particularly to be noted that, as referred to above (1.7), the construction phase must, if consent is given, run concurrently with the construction phases of the already-consented Awel y Môr substation, and the doubling in size of the existing National Grid substation which will be required if the Mona project is indeed consented.</p>	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-094.12	2.4 On the basis of the above, the Council restates its contention that the siting of the Mona onshore substation in the location proposed is wholly inappropriate both in itself and in relation to the other projects whose cumulative effects it will be a part of, and that the scale of its impact is such that it cannot be effectively mitigated.	

3 Response to Cefn Meiriadog Community Council D4 Submission - The Old Lane

Table 3.1: REP4-095 - Cefn Meiriadog Community Council

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-095.1	Cefn Meiriadog Community Council ('CMCC'/'The Council') has noted that the Applicant's Land Plan (Onshore) [Document number: MOCNS-J3303-DMC-10001 Document Reference: B5] of February 2024 includes the proposal to include within the Mona Onshore Order Limits [MO_PRJ_BP_0162_Rev11] an area of land to whose use it strongly objects.	The plot referred to in this representation (10-187) will form part of Work No 38. In accordance with the draft Development Consent Order (C1 F06), Work No. 38 will provide permanent access to the onshore cable easement. This access will only be used during the operation and maintenance phase of the Mona Offshore Wind Project. As described in paragraph 3.9.2.1 of the Project Description (APP-050) the onshore operations and maintenance requirements for the onshore export cables will involve infrequent on-site inspections and corrective maintenance activities at link box locations along the onshore export cables on foot and with light vehicles only. No alterations will need to be made to the access and the public's rights will be maintained.
REP4-095.2	The area of land in question is designated 10-187 on Drawing Title Land Plan - Onshore Sheet Number: 10, and is identified as 'Land Subject to Temporary Occupation and Use and Acquisition of Permanent Rights'	
REP4-095.3	It is a narrow unpaved lane running north-east to south-west from the minor road through Groesffordd Marli from near the properties Groesffordd Farm and Trebanog, and providing a link near the properties Plas Hafod and Plas Newydd to the minor road from Sinan church to Cefn and Bontnewydd.	
REP4-095.4	The rights that the Applicant is seeking under the Mona Onshore Order Limits cover approximately a third of the lane's overall length, at its north-eastern end close to the properties Groesffordd Farm and Trebanog.	
REP4-095.5	This lane, which is known locally as 'The Old Lane', is the subject of a longstanding Public Right of Way claim which was originated several years ago but was delayed due to Covid and other matters; which, following all due legal processes having been completed, has now been agreed by Denbighshire County Council (DCC); and which is now in its very final stage, with 'The Old Lane' to be designated a Public Bridleway by DCC.	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-095.6	<p>For many years it was assumed within the community that 'The Old Lane' was already a public right of way, but an awareness of its history is important in understanding why this was not in fact the case. With the building of Rhuddlan Castle by Edward I in 1277, Rhuddlan became the main port for the Vale of Clwyd, and "Even in the 19th Century...the port still functioned... It had become a depot supplying coal, food stuffs, and the like to towns deeper into the Vale of Clwyd, but the principal trade was the export of grain and timber...". [Clwyd Powys Archaeological Trust Historic Settlement Survey – Denbighshire - 2014: Rhuddlan SJ 0280 7721 105808]. For the centuries when Rhuddlan was fulfilling its role as the main port for the Vale of Clwyd, 'The Old Lane' formed a portion of the route for transporting goods from Rhuddlan port to the village of Llanefydd and on to Llansannan. Being a public thoroughfare ("A road or path forming a route between two places" [Oxford Languages]) anyway, and not at any point involving crossing private land, designating it a public right of way would have been unnecessary and redundant.</p>	
REP4-095.7	<p>With the advent of the railways and the development of a port at Rhyl, the ending in the second half of the 19th century of Rhuddlan's role as a port meant the lane's demise as a transport route. However, while other portions of the route are discernible here and there but have mostly disappeared, 'The Old Lane' has retained its physical characteristics as a distinct lane and thoroughfare, clearly because even after falling into disuse for the transport of goods, it was an important short-cut and walking route between the two minor roads it links.</p>	
REP4-095.8	<p>More recently in the 20th and 21st centuries, it has become a wellused recreational route used by walkers, riders, runners, dog-owners and others, as well as providing a degree of access to the adjacent fields for those farming them (but see 9 below). It was on this basis, therefore, that</p>	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	<p>CMCC submitted a Public Right of Way claim to DCC, supported by relevant and extensive documentation of its usage by the community. Although substantially delayed, as stated the claim has been agreed and 'The Old Lane' recognised as a public right of way.</p>	
<p>REP4-095.9</p>	<p>It is important to point out that, regardless of its status, the lane is entirely unsuitable for use by large or heavy vehicles of the type that it is assumed that the Applicant would propose to use in accessing the cable corridor, being very narrow with high hedges. An indication of its unsuitability is the fact that access to its adjoining fields by local farmers is limited to quad bikes, and then only occasionally. The lane presents particularly muddy conditions in winter, and its use by vehicles accessing the cable corridor would render it unusable by walkers, riders and other users from the local community.</p>	<p>Table 8.8 of the Traffic and Transport Chapter (APP-071) describes how during the operational phase, the only vehicle movements generated will be maintenance visits, which will be typically one vehicle on an approximate weekly basis. These visits are likely to be made by light vehicles only and would use the existing road network.</p> <p>The use of this access by the Mona Offshore Wind Project will be similar to the existing use by local farmers. As an access to the onshore cable easement (rather than the onshore substation), visits are likely to be less frequent than once a week. Visits will be made by personnel in a 4x4, if conditions are unsuitable for a 4x4, the personnel may use the track to access the onshore cable easement by foot. No heavy vehicles will use this access to access the cable corridor.</p>
<p>REP4-095.10</p>	<p>It is equally important to point out that the minor road through Groesffordd Marli from which access to 'The Old Lane' must be obtained is itself highly unsuitable for large and heavy vehicles and would present severe difficulties for such vehicles and for residents living along the route.</p>	
<p>REP4-095.11</p>	<p>For the sake of completeness it should also be pointed out that access point from the lane into the adjacent field shown on the Applicant's Land Plan is in close proximity to sites of exceptionally intense badger activity and extensive setts.</p>	<p>The Applicant has undertaken a series of surveys for badger (Badger Survey Technical Report (APP-134)) and is committed to undertaking further pre-construction surveys (Outline Landscape and Ecology Management Plan (J22 F03) to understand the extent of the badger population in the area. Throughout the operational phase best practice measures will be implemented to ensure that no badgers are harmed.</p>
<p>REP4-095.12</p>	<p>On the basis of the above, Cefn Meiriadog Community Council strongly objects to the inclusion of 'The Old Lane' in the Applicant's Onshore Order Limits and requests that it be excluded and that the Applicant be required to find an alternative route.</p>	<p>The Applicant maintains that this is an appropriate location for an operational access to the onshore cable easement, given the limited activity that would take place through the operation and maintenance period.</p>

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-095.13.	<p>Rhuddlan was once the main port for the Vale of Clwyd. King Edward I ordered that the river Clwyd be made navigable so that ships could supply his new castle (begun 1277) at Rhuddlan.</p> <p>A summary of Elizabethan ports in 1561/2 records Rhuddlan as 'a barred haven and a good Creke where is a noble Castell of ye Kings and well kept'. From the 16th century the main harbour developed downstream from the bridge, initially extending for around 100m on either bank, but later focusing on the wharfage along the eastern bank.</p> <p>As a port, though, Rhuddlan continued to have its uses and the King had several vessels there in 1646, laden with corn, bacon and other provisions waiting to relieve the siege of Chester.</p> <p>19C-T</p>	<p>The Applicant assumes these notes have been included in error and has not provided a response.</p>