

MONA OFFSHORE WIND PROJECT

Response to Conwy County Borough Council and Denbighshire County Council ExQ2 Submission

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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, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).

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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 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.

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Term	Meaning
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 Bodelyyddan 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).
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.

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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

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

1 Response to Conwy County Borough Council and Denbighshire County Council ExQ2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Conwy County Borough Council and Denbighshire County Council's response to ExQ2 below.

2 Response to Conwy County Borough Council and Denbighshire County Council ExQ2 Submission

Table 2.1: REP5-089 – CCBC and DCC

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Conwy County Borough Council and Denbighshire County Council Response	Applicant's response
REP5-089.1	CCBC	<p>Q2.6.11</p> <p>CCBC</p> <p>Do you agree with the Applicant's account of negotiations with you in its Land Rights Tracker [REP4- 091]? If not, please specify why not. What agreement or assurances would the Applicant need to provide to you to enable CCBC to reach voluntary agreement with it in respect of rights that are being sought in your land?</p>	<p>CCBC's land agent has reviewed REP4-091 and has confirmed that the account of negotiations is broadly correct. There are several aspects to be resolved in order to agree terms in principle for a voluntary agreement including but not limited to:</p> <ul style="list-style-type: none"> • Outstanding requested information and detail being provided. • Commercial negotiations to be concluded to CCBC's satisfaction. • Aspects relating to CCBC's rights to carry out future works on the subject lands. • Aspects relating to obligations (mainly landscaping maintenance) being put on CCBC by the scheme. 	<p>The Applicants land agents have been in ongoing dialog with CCBC agents and believe all of the information requested that is available at this stage has now been provided. The concerns around ability for future works is believed to now been addressed and suitable provisions agreed. As of 18 December 2024, negotiations regarding maintenance obligations and commercial matters are ongoing and hope to be concluded by deadline 7.</p>
REP5-089.2	CCBC DCC	<p>Q2.6.25</p> <p>Open Space</p> <p>In its Response to CCBC and DCC ExQ1 Responses ([REP4-058], REP3-078.7) the Applicant addressed your concerns in response to Q1.6.14 (PD-013). With reasons for your position, does its explanation address your concerns?</p>	<p>The Councils confirm that the response provided by the Applicant at Deadline 4, in 'Response to Conwy County Borough Council and Denbighshire County Council ExQ1 Responses' [REP4-058] is sufficient in addressing concerns, confirming that access would remain available to users of Pensarn Beach Car Park.</p>	<p>The Applicant welcomes this response. The SoCG with CCBC has been updated to reflect this agreement (REP5-054, CCBC.DCO.13).</p>

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Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Conwy County Borough Council and Denbighshire County Council Response	Applicant's response
REP5-089.3	CCBC DCC	Q2.8.11 Water Framework Directive Does the Applicant's Geomorphology Clarification Note [REP4-040] address your comment regarding geomorphology characterisation in your LIR [REP1-048] and SoCG with the Applicant [REP3-061]? If not, what further information or evidence do you need from the Applicant to allay your concern?	Yes, the Applicant's Geomorphology Clarification Note [REP4-040] addresses the comment regarding geomorphology characterisation. As reflected in the SoCG with CCBC and the SoCG with DCC submitted at this deadline (Deadline 5), this matter is now agreed.	The Applicant welcomes this response. The SoCGs with CCBC and DCC has been updated to reflect this agreement (REP5-054, Section 1.4.4 and REP5-053, Section 1.4.4).
REP5-089.4	CCBC DCC	Q2.8.15 Flood Risk & Water Resources In your LIR [REP1-049] you concluded that the Proposed Development's potential effects on flood risk and water resources had not been properly assessed. Subsequent to the Applicant's response to your LIR [REP2-085] and exchanges between it and NRW ([REP2-080], [REP3-090], [REP4-105]) have those concerns been allayed?	Yes, as reflected in the SoCG with CCBC and the SoCG with DCC submitted at this deadline (Deadline 5), this matter is now agreed.	The Applicant welcomes this response. The SoCGs with CCBC and DCC has been updated to reflect this agreement (REP5-054, Section 1.4.4 and REP5-053, Section 1.4.4).
REP5-089.5	CCBC DCC	Q2.12.4 Public Rights of Way In you LIR [REP1-049] specific concerns were raised about the Proposed Development's impact on PRowS. The Applicant	No. The Councils are content that this matter is now resolved.	The Applicant welcomes this response.

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Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Conwy County Borough Council and Denbighshire County Council Response	Applicant's response
		addressed these in its response your LIR ([REP2-085, REP1-049.48 & REP1- 049.157). Have you any outstanding associated concerns?		
REP5-089.6	DCC	<p>Q2.12.5 'The Old Lane', Groesffordd Marli From your perspective, what is the legal status of Plot no. 10-187 as shown on the BoR [REP3- 006]?</p> <p>If it is not part of a designated Public Bridleway, are there plans to do so?</p> <p>If it is to be designated as such, when is this likely to happen?</p>	<p>a) At present the route is shown as a lane with no recorded public status on either the road adoption records or definitive map, however it is possible for historic rights to not be adequately recorded or that as a result of the provisions in S31 Highways Act 1980 after 20 years use a public right could be established. This county is under a statutory duty to amend its records if it discovers they are incorrect.</p> <p>b) Following an approach by the Community Council over the status of the track and the presentation of evidence gathered by them and from looking at historic records, the authority accepts on balance of probabilities that the definitive map is presently incorrect and that the way should be recorded as a bridleway. After reviewing the evidence we are about to make a Definitive Map Modification Order to have the rights recorded on the definitive map as a bridleway.</p> <p>c) The order is to be made imminently. We have just completed a preliminary informal consultation to determine if there is any evidence we are aware of that may alter our opinion. The length of time the matter takes is dependant if any objections are made to the order. If none ,it is likely the order will be confirmed by DCC within 12 months. If there is an objection that cannot be withdrawn the matter is passed to Welsh Government who will ask PEDW to determine if the Welsh Ministers should confirm the order. The timescale to this is uncertain but</p>	<p>The Applicant has been made aware of the proposals regarding The Old Lane, Groesffordd Marli. The Applicant has included part of The Old Lane within the order limits, which will provide permanent access to the onshore cable easement. The Applicant engaged with the Denbighshire County Council Public Rights of Way Officer in November 2024 and no concerns were raised regarding use of this access. Further detail can be found in the Applicant's response to Cefn Meiriadog Community Council Deadline 4 Submissions (REP5-057).</p>

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Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Conwy County Borough Council and Denbighshire County Council Response	Applicant's response
REP5-089.7	CCBC DCC	<p>Q2.13.2</p> <p>Construction Lighting</p> <p>Do the Councils have any comment on the Applicant's Lighting Clarification note [REP4-043], in particular, paragraph 1.2.4.2, which states: "A separate assessment of lighting was not considered proportionate given that the use of task lighting will be temporary and localised and given the fact that task lighting will be controlled through the implementation of the Outline Artificial Light Emissions Plan"?</p>	<p>because of a significant backlog in such work in Cardiff the outcome may take 2 – 3 years to reach a conclusion.</p> <p>The Councils are content with Paragraph 1.2.4.2 in the Clarification note [REP4-043] and in particular that Requirements 9 and 16 related provide adequate control of artificial lighting through the submission and agreement by the relevant planning authority of the Artificial Light Emissions Plan. It is noted that important aspects of the acceptability of this approach, to not assess the potential for landscape and visual impacts, is based on the Applicant's commitment that both construction and operation lighting will be:</p> <ul style="list-style-type: none"> • Infrequent on account of it being manually or automatically switched and for use only as necessary, • unlikely to give rise to any night time landscape and visual effects: and • will be mitigated through design to maximise the efficiency of that lighting and to minimise any light spill. <p>It is suggested that in the Artificial Light Emissions Plan submitted to discharge related Requirements that the Applicant include a section on adaptively monitoring the successful management of artificial light through construction and operation.</p>	<p>The Applicant welcomes this response. The Applicant has updated the Outline Artificial Light Emissions Plan (J26.10 F03), to include the commitment to adaptive monitoring of lighting.</p>
REP5-089.8	DCC CCBC	<p>Q2.16.3</p> <p>Noise assessment and monitoring</p> <p>Further to your Response to First Written Questions ([REP3-078],</p>	<p>No, the Councils are content that the Applicant's responses resolve the points raised by the IP and so do not share the IP's concerns.</p>	<p>The Applicant welcomes this response. The SoCGs with CCBC and DCC has been updated to reflect this agreement (REP5-054, Section 1.4.5 and REP5-053, Section 1.4.5).</p>

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Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Conwy County Borough Council and Denbighshire County Council Response	Applicant's response
		Q1.16.3), amongst other things, IPs rebutted the Applicant's response [REP2-078] to their initial concerns about noise assessment and monitoring [REP1-086]. Taking account of the IPs' submission [REP3- 110] and the Applicant's response [REP4-056], with reasoning for your conclusions, do you share any of the former's on-going concerns?		
REP5-089.9	DCC CCBC	<p>Q2.16.4</p> <p>Construction Noise and Vibration Clarification Note</p> <p>Either in response to this question at Deadline 5 or at Deadline 6 when the Applicant has submitted its updated versions of the Noise and Vibration Chapter of the ES [APP-072] and the Construction noise and vibration technical report [APP-179] at Deadline 5, with reasoning for your position, please advise whether you agree with the Applicant's assumptions/ methodology, analysis and conclusions in its Construction noise and vibration clarification note [REP4-045]</p>	<p>The Councils have reviewed the Construction Noise and Vibration Clarification Note [REP4-045]. The Councils are in agreement with the content and conclusions of the note, however it does not address specifically the concern raised by the Councils in its Local Impact Report [REP1-049] regarding structural amplification. The Councils understand that the Applicant is to share further information on this imminently, with a view to providing an update at a future deadline via the SoCG.</p>	<p>The Applicant welcomes this response. Where relevant the SoCGs with CCBC and DCC have been updated at Deadline 5 (REP5-054, Section 1.4.5 and REP5-053, Section 1.4.5).</p> <p>The Applicant has prepared a clarification note to address the Council's concerns around construction vibration, including structural amplification. This has been appended to the SoCGs with CCBC and DCC (S_D3_23 F03, S_D3_23 F03). CCBC and DCC have confirmed that this note has addressed their concerns and all matters regarding noise and vibration have now been agreed in the SoCGs with CCBC and DCC (S_D3_23 F03, Section 1.4.5 and S_D3_23 F03, Section 1.4.5).</p>