

MONA OFFSHORE WIND PROJECT

Response to Welsh Government ExQ2 Submission

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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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 Welsh Government ExQ2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Welsh Government's ExQ2 submission below.

2 Response to Welsh Government ExQ2 Submission

Table 2.1: REP5-090 – Welsh Government

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	Welsh Government response	Applicant's response
REP5-090.1	The Applicant Welsh Government	Q2.0.3 Statement of Common Ground Produce a Statement of Common Ground on all issues of relevance to The Welsh Government. For submission at Deadline 5, with final version at Deadline 7. Add The Welsh Government to the Statement of Commonality.	<p>The Applicant and Welsh Government met on 25 November to discuss the ExA's request for a joint SoCG. Welsh Government confirmed that its principal areas of interest relate to archaeology and heritage, and highways (on behalf of Welsh Ministers). Agreement on archaeology and heritage is being progressed through a SoCG with Cadw (REP1-034), an update of which will be submitted to the examination at Deadline 6, subject to agreeing meetings dates between the parties. The matter of Welsh Ministers' interests in highways is being progressed through relevant Protective Provisions, with a meeting held on 25 November to progress agreed drafting. Welsh Government and the Applicant can confirm that there are no other open issues, or areas of disagreement between the parties, and therefore do not intend to submit a SoCG into the Mona examination.</p> <p>The parties are also in discussion about a potential non-legal Memorandum of Understanding (MoU) regarding future engagement on joint working areas such as community benefits, ports, skills and supply chains, and Welsh language matters, with a meeting held on 26 November to discuss the matter. The Applicant and Welsh Government intend to discuss this matter outside of the Mona examination process, and therefore the MoU will not be submitted into the Examination.</p>	The Applicant appreciates the Welsh Government's collaborative approach regarding these matters.
REP5-090.2	The Applicant Welsh Government	Q2.5.1 Welsh Policy Can you advise if and how the Proposed Development aligns with The Welsh National Marine Plan and: <ul style="list-style-type: none"> ▪ ECON_01: Sustainable economic growth; and ▪ FIS_01: Fisheries 	<p>WNMP policy: ECON_01 provides a basis for supporting projects which contribute positively to sustainable economic growth. The applicant can best set out how the proposal contributes to this policy. FIS_01 supports sustainable fishing activity. SAF_01b recognises and seeks to safeguard established fishing activity. In accordance with SAF_01b, the applicant should set out how established fishing interests have been taken into account in the proposal.</p>	<p>The Applicant refers Welsh Government and the ExA to its response to Q2.5.1 of the Examining Authority's Written Questions (ExQ2) (REP5-080), which provides a detailed account of compliance with ECON_01: Sustainable Economic Growth and parts (a) and (b) of Sector Supporting Policy FIS_01: Fisheries.</p> <p>The Applicant confirms that it has fully complied with part (b) of policy SAF_01: Safeguarding existing policy (SAF_01b) of the Welsh National Marine Plan (WNMP), which recognises the importance of safeguarding established fishing activity. It is important to note that in the context of commercial fisheries, this policy falls under the overarching FIS_01 and emphasises that proposals should seek to safeguard established fishing activities and enable these activities to continue and thrive wherever possible.</p> <p>The Applicant has made significant commitments to facilitate co-existence and co-location with existing commercial fisheries within the Mona Array Area and Offshore Export Cable Corridor. These measures are focused on safeguarding important fishing grounds while supporting the continuation of established fishing activities. These commitments are secured in the Outline Fisheries Liaison and Co-existence Plan (FLCP) (REP3-016) with the requirement for the Final FLCP (which must accord with the Outline FLCP (REP3-016)) secured within Condition 18(1)(e)(v) of the deemed marine licence under Schedule 14 of the draft DCO (C1 F07) and expected to be secured within the standalone NRW marine licence)</p> <p>The Applicant has engaged extensively with key commercial fishing stakeholders to develop and inform these commitments. This began in June 2021, with stakeholders identified through consultation with a regional Fishing Industry Representative (FIR), as summarised in Table 6.5 of Volume 2, Chapter 6: Commercial Fisheries (APP-058) and detailed in Appendix H of the Technical Engagement Plan Appendices - Part 2 (F to M) (APP-042).</p> <p>Post-Environmental Impact Assessment (EIA) scoping discussions were held in Autumn 2022 to address specific requirements for continued access and fishing within the Mona Array Area and Offshore Export Cable Corridor. These discussions</p>

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	Welsh Government response	Applicant's response
				<p>focused on key fisheries, including UK and non-UK vessels targeting queen scallops and static gear (potting) vessels. Key considerations included the following:</p> <ul style="list-style-type: none"> • Avoidance of infrastructure over important queen scallop grounds. • Sufficient spacing between infrastructure to allow continued fishing access. • Orientation of wind turbines to align with dominant towing directions. • Burying of cables and minimising the use of cable protection. <p>Further engagement was conducted in Winter 2022, specifically with scallop fishing stakeholders, to develop the concept of a Scallop Mitigation Zone (SMZ) with a further round of pre-application consultation on the commitments made to facilitate co-existence and co-location following statutory consultation on the Preliminary Environmental Information Report (PEIR).</p> <p>Through these commitments and proactive engagement efforts, the Applicant has ensured that the project design supports the continued viability of commercial fisheries in accordance with SAF_01b. The Applicant remains committed to working collaboratively with stakeholders to enable co-existence and safeguard established fishing interests.</p>
REP5-090.5	The Applicant	<p>Q2.18.7 Planting density The Welsh Government in its written representation [REP1-052] referred to planting density for new woodland should be at 2500 plants/ha. Can you confirm the planting density for new woodland and how would it be secured in the dDCO.</p>	<p>Although this question is not directed at Welsh Government, for information, planting density for new woodlands can be found within the Welsh Government Woodland Creation Grant which reflects this standard density. Woodland Creation Grant (window 4): rules booklet [HTML] GOV.WALES You will see that stocking density depends on the type of woodland to be planted. However, given that there is little information on the type or amount of woodland to be removed, we recommend the density of 2500 plants/ha as outlined in earlier written representation quoted here.</p>	<p>The Applicant considers that it is not appropriate to define a minimum planting density at this stage as the density should be appropriate to the site conditions and reflect the purpose of the planting. The Applicant notes it has committed to planting ratios (as set out in the Design Principles (J3 F04)) and that the density of mitigation planting (including woodland planting) will be defined in the detailed landscape plans that will be prepared during detailed design. The landscape plans will be based on the principles set out in the Outline LEMP (J22 F04) and the Design Principles (J3 F04)) and are secured in Requirement 7 of the DCO and will be agreed with the relevant planning authority through the discharge process.</p>
REP5-090.6	Welsh Government	<p>Q2.21.1 Memorandum of Understanding The Applicant has responded favourably [REP4-061] to the Welsh Government's suggestion of a 'nonlegal Memorandum of Understanding' to set out key areas of joint working on areas such as community benefits, skills development, supply chains, ports and Welsh language matters. Will the Memorandum of Understanding be submitted into this Examination, and if so, when?</p>	<p>The parties met on the 26th of November to discuss the development of a non-legal Memorandum of Understanding and will progress to develop a broad framework that will include:</p> <ul style="list-style-type: none"> • Joint working principles • Scope – (including potential of linking with other significant infrastructure projects) • Roles and responsibilities • Areas of further collaboration. <p>Parties have agreed that further meetings will take place to define further areas of collaboration which broadly follow these main headings:</p> <ul style="list-style-type: none"> • Promoting regional economic development – Ports, Skills Development, Supply Chain and Foreign Direct Investment • Community Development - community benefits • Welsh Language • Health impacts <p>The WG is also looking to work with the Offshore Energy Alliance to propose a framework to ensure a strategic approach with significant projects and that such MoUs will provide a useful understanding of how each project will contribute to the 'in-combination' scale of opportunities for the region.</p>	<p>The Applicant remains committed to developing a Memorandum of Understanding with the Welsh Government. The parties met on 13 December 2024 to progress the matter and agreed the next steps. A further meeting has been scheduled for 24 January 2025 to refine a draft of the MoU, with a view to holding a high-level workshop in February/March 2025 to finalise its scope and content.</p> <p>The Applicant appreciates the Welsh Government's collaborative approach on this matter.</p>