Partners in UK offshore wind

# MONA OFFSHORE WIND PROJECT

## Response to Design Commission for Wales – Design Review Report

**Deadline: 6**

**Application Reference: EN010137**

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Image of an offshore wind farm

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## Document status

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**Prepared for:**

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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). |

| Term | Meaning |
|---|---|
| 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. |

| 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 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.<br>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. |

# 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 |

| Unit | Description |
|---|---|
| km | Kilometres |
| $km^2$ | Kilometres squared |
| kV | Kilovolt |
| MW | Megawatt |
| nm | Nautical miles |

# 1 Response to the Design Commission for Wales

## 1.1 Introduction

1.1.1.1 The Applicant has responded to the Design Commission for Wales Deadline 5 submission below.

# 2 Response to the Design Commission for Wales Design Review Report

### Table 2.1: REP5-112 – Design Commission for Wales

| Planning Inspectorate Ref. No. | Written Submission Comment | Applicant's response |
|---|---|---|
| REP5-112.1 | Key Points<br>The process that has been undertaken to date and the current stage achieved were presented clearly. We understand the application represents the maximum development to be permitted. | The Applicant welcomes this comment. |
| REP5-112.2 | The size and scale of the substation, and its location mean greater commitment to good design is needed – above and beyond mitigation measures. | The Applicant has proposed a landscape and ecology strategy within the Outline Landscape and Ecology Management Plan (J22 F04) that provides both mitigation and enhancement at the Onshore Substation. The Applicant's commitment to good design in presented in the Design Principles (J3 F04). |
| REP5-112.3 | Whilst some elements of the landscape design philosophy and treatments are clearer, illustrations and a narrative are still needed that reflect and commit to qualitative client ambition and commitment, beyond the technical requirements, and beyond mitigation to enhancement. | The Design Principles was updated at Deadline 5 (REP5-020) to provide a clearer narrative of the Applicant's design vision, including both mitigation and enhancement measures. |
| REP5-112.4 | The existing Design Principles, even if translated into a 'Design Guide', are not sufficiently robust to provide clear stewardship of the delivery requirements, post-consent. A stronger, well-communicated design strategy would be more useful to the local authority in the discharge of conditions and to the applicant and delivery team in their tender process and detailed design. | The Applicant maintains that Design Principles show a strong commitment to good design while being proportionate for this stage in the DCO process. The Design Guide will be developed post-consent, in consultation with the Design Commission for Wales, to ensure the design strategy is communicated both internally within the Project and externally to the local planning authorities as the detailed design is developed. |
| REP5-112.5 | Greater expectation and control over the design is available to the development team throughout design development including the tender processes, and the Design Principles do not yet work in this regard. The consideration and coordination of elements of the substation equipment layout is important given its size and the scale of structures proposed within it. | It is anticipated that the Design Guide, which will be developed post-consent, in consultation with the Design Commission for Wales, will support discussions between the Applicant and the supply chain to ensure good design is achieved through the detailed design process. |

| Planning Inspectorate Ref. No. | Written Submission Comment | Applicant's response |
|---|---|---|
| REP5-112.6 | The nature and intent of the agreed requirements reflected in the Development Consent Order, should it be granted, are vital to ensuring genuine design quality commitment at every stage of delivery. The developer, Examining Authority and the local authority all have a role in this securing of a good design process and outcome, post-consent. | Requirement 5 of the Draft Development Consent Order (C1 F07) states that the details of the onshore substation submitted to the relevant authorities for discharge must be substantially in accordance with the design principles. The Applicant believes this requirement is adequate for securing good design within the DCO. |
| REP5-112.7 | There remains an issue of cumulative impact of various interventions related to the National Grid connection point at Bodelwyddan which needs to be considered and that would benefit from strategic coordination. Given the context for renewable energy in Wales, the local authority working with neighbouring authorities, Welsh Government, National Grid and other stakeholders should take steps to develop a comprehensive strategic masterplan that addresses this particular location and its landscape capacity as renewable energy development proposals increase in number and at pace. This would aid all parties and contribute to risk management and consenting regimes. This is broader strategic issue across Wales that would benefit from Welsh Government attention. | The Applicant agrees with the Design Commission for Wales and believes the Denbighshire County Council or Welsh Government are best placed to deliver a landscape-led masterplan for the area, as the Applicant has little to no influence over the landscape mitigation proposals put forward by other developers as part of separate projects.<br>The Applicant would be happy and willing to discuss involvement in such a process should those coordinating organisations bring it forward. |
| REP5-112.8 | Consultation to Date<br>This is the second Design Review with the Design Commission for Wales. The first review meeting took place in August 2023 and this report should be read in conjunction with our earlier report. The Design Commission previously responded to questions arising from the examination process. That correspondence is appended to this report. | The Design Review Report was submitted into the Examination (RR-014) and the Applicant has responded at the Procedural Deadline (PDA-008, Table 2.14). |
| REP5-112.9 | The Proposal<br>The Mona Offshore Wind Project is a wind energy generating installation and, for consenting purposes, is categorised as a Nationally Significant Infrastructure Project (NSIP) requiring a Development Consent Order (DCO) via the Infrastructure Planning Inspectorate. The proposals encompass offshore wind farm development, associated offshore and onshore infrastructure as | While the key components of the Mona Offshore Wind Project outlined in the Design Review Report are generally correct, the Applicants notes the maximum number of turbines has been reduced from 107 to 96, the Array Area is 300 km$^2$ and 28.8 km for the Ynys Môn (Anglesey) coastline. Final proposals for which Development Consent is sought are presented in Volume 1, Chapter 3: Project Description of the Environmental Statement (APP-050). |

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|---|---|---|
| | required to connect turbine generators and to facilitate connections to the national grid. The Mona Array Area (i.e. the area within which up to 107 offshore wind turbines will be located), is 449.97km2 in area and is located 28.2km (15.2nm) from the Ynys Môn (Anglesey) coastline. The key components of the Mona Offshore Wind Project include:<br>• Offshore wind turbines<br>• Foundations (for wind turbines and Offshore Substation Platforms (OSPs))<br>• Scour protection<br>• Inter-array cables linking the individual wind turbines to the OSPs<br>• Connection works to the existing Bodelwyddan National Grid substation<br>• Temporary construction compounds, including storage areas<br>• Permanent and temporary access roads<br>• High Voltage Alternating Current (HVAC) transmission system including: – OSPs, Offshore interconnector cable(s), Offshore export cable(s), Mona 400kV Grid Connection Cable, Onshore export cable(s), Onshore Substation | |
| REP5-112.10 | At the time of this second design review meeting in November 2024, the proposals are at examination stage with determination expected mid-2025, following submission and Acceptance of Application for a Development Consent Order (DCO) in March 2024. Examinations began in July 2024 and due to end in January 2025. The remaining programme is: Deadline 5: 3rd December; Issue Specific Hearings: 10th – 11th December; Deadline 6: 20th December; Deadline 7 14th January 2025; Close 16th January 2025, followed by a 6 month decision period. Consent, if granted, would be expected in July 2025 with the project generating power by 2030. | This is noted by the Applicant, who concurs with the programme outlined in the Design Review Report. |

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| REP5-112.11 | Context<br>The onshore cables and onshore substation will be located within the Mona Proposed Onshore Development Area, which overlaps Conwy and Denbighshire, in north Wales. Connection will be made with the Bodelwyddan National Grid Substation to the west of St Asaph. The proposed location of the substation was selected prior to the August 2023 review meeting and is located to the south of the National Grid Substation, south of St Asaph Business Park. Several other substations are located or proposed in this area relating to other offshore wind farms that also plan to connect to the grid at this point. | This is noted by the Applicant, who agrees with the description of the context of the Mona Offshore Wind Project presented in the Design Review Report. |
| REP5-112.12 | Main Points<br>**Design Principles**<br>At this Design Review meeting the Design Commission returned to key aspects of the design approach to the substation, given its size, scale and location in a landscape setting. | The Applicant has responded to the individual points below. |
| REP5-112.13 | The design process presented at this stage, as at the previous stages remains largely constraints-driven. In our previous report we noted that the review discussion revealed a potentially more ambitious approach that sought to better understand and then respond to the landscape. This opportunity remains undocumented and is not presented or communicated as part of a narrative for the scheme or, crucially, embedded into firm commitments for the project. The Commission advocated a more qualitative analysis of the existing landscape context in order to inform a clearly presented vision. This analysis would include consideration of the history of the area, landscape character and functions, natural vs manmade interventions, noise, views etc. This approach is not evidenced in the materials and the approach remains one of constraints and mitigation. | The Applicants approach to good design has evolved throughout the development process. Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-016) outlines the process for selecting the onshore substation site, which was a constraints-driven process. Further technical studies have been undertaken as part of the Environmental Impact Assessment, which has analysed the historic environment, landscape character, existing views and the baseline noise environment. The EIA has then been used to inform the design principles and parameters outline in the Design Principles (J3 F04). Further qualitative analysis will be undertaken as part of detailed design, post-consent. The results of an initial baseline colour assessment were presented as an appendix to the Design Principles at Deadline 5 (REP5-020), as an example of the types of additional studies that will be undertaken to inform detailed design, post-consent. |
| REP5-112.14 | In our previous report we advised that '*Further work is needed to inform the proposals and present a coherent approach to design which is clearly discernible amongst the myriad of other material that* | Following the first design review the Applicant developed the Design Principles (J3 F04). This document includes the high-level design |

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|---|---|---|
| | *accompanies a consent application of this scale. This work should include definition of high-level design principles that are guiding work across the whole project, that can then lead to sub-sets of more detailed principles or design commitments specific to individual elements of the work or individual sites, enabling appropriate responses to local context.*' Other than a 'philosophy of enclosure' this work is still not evident, in either the approach to integrating the substation into the landscape or in the layout of the components with the substation itself. We therefore refer the team to our earlier report for subsequent detailed comment on design development and the application of design principles in practice, which remain relevant. | principles adopted by the Project and lists the subset of design principles and commitments in Section 3.<br>The Design Principles sets out how the design will be developed post-consent to consider how the Onshore Substation will be integrated into the environment (for example through use of colour and landscaping planting) and how the layout of components will be considered while maintaining the safety and functionality of the Onshore Substation. The Applicants position this the level of detail provided is proportionate for this stage in the DCO process. |
| REP5-112.15 | We would expect to see a clear, well-illustrated design statement (to explain what the application design proposal is and how it has been established) for development at any scale. This vital explanatory document should address and resolve the design issues raised in this report but, as far as we are able to ascertain at the time of review, appears to be missing from the DCO application material that we have seen. | The Design Principles was updated at Deadline 5 (REP5-020) to more clearly provide the overarching design principles that have been by adopted by the Project and the overarching vision for the Onshore Substation. In addition, a section has been added on the Beneficial Outcomes of the Project.<br>The Applicant has committed to developing the Design Guide post-consent to provide further detail on all elements of substation design, including how the onshore substation will fit into the surrounding landscape. This is likely to include further illustrations and visualisations to demonstrate what design choices are available. |
| REP5-112.16 | The Design Principles and/or Design Guide work (to define what post-DCO design remains, how it will proceed and be controlled, and defining the client's commitments) should reflect a strength of commitment from the development team to a range of issues relating to landscape quality as well as capacity, drawing from an in depth understanding of the landscape, and used to develop a more considered approach with benefits beyond mitigation measures. The substation, along with others in proximity, represents a development on an urban/townscape scale and requires more than 'enclosure'. Written and drawn materials conveying a design vision and principles which underpin it are still needed. | |
| REP5-112.17 | There should also be a clear programme chart showing the key decisions to be made, their sequence and which consultees or authorities will be involved in each one. | An indicative programme for post-consent consultation on the Design Guide been included in the updated Design Principles submitted at Deadline 5 (REP5-020). |
| REP5-112.18 | The Design Guide, if better defined, could be valuable as part of a design development and control process extending through detailed | Requirement 5 of the Draft Development Consent Order (C1 F07) states that the details of the onshore substation submitted to the relevant |

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|---|---|---|
| | design, into tender and the delivery processes. It can be used to document the process of design iteration and control and set out key design principles that must be adhered to as the design progresses onto site. It should form part of the contractual processes for the detailed design/contractor teams and form part of the requirements linked to the DCO Order so it has material weight. It should anticipate the need for design and construction flexibility, i.e. not be too prescriptive, but should very clearly articulate and evidence how the principles established as part of the EIA and design development to date can be upheld through to delivery, operation and maintenance. | authorities for discharge must be in accordance with the design principles. The Applicant believes this requirement ensures material wight is given to good design within the DCO.<br>The Applicant will use the Design Guide, which will be developed post-consent, in its conversations with the supply chain and welcomes further engagement with the Design Commission for Wales on the development of this document. |
| REP5-112.19 | This will be particularly important where truncated timescales post consent could lead to tension between expedience and optimal decisions. For example, clarity of approach and well-choreographed and coordinated elements can make a considerable positive difference beyond the technical, in terms of layout, materials colour and lighting, and more thought should be given securing this in the tender process. | While it is critical that the construction programme is maintained to ensure the project's ability to meet the National Grid connection date (Q3 2029) and fulfil its role in contributing the UK Government's renewable energy target of 50 GW of offshore wind by 2030 and that the Project is developed in the most economic and efficient manner to meet the requirements of NPS EN-5, the Applicant is committed to achieving good design and is demonstrated through the commitments outlined in the Design Principles (J3 F04). |
| REP5-112.20 | In addition, the design guide should set out a design strategy for how the 'maximum development' would be changed if it proves that something less than the maximum space taken can be achieved as choices of systems and equipment are made. | Section 3.3 of the Design Principles (J3 F04) described how the overall substation layout will be determined during detailed design and subsequently approved by Denbighshire County Council, depending on the electrical system design, number and rating of cables and the choice of contractor. |
| REP5-112.21 | **Strategic Coordination**<br>There remains a need for strategic planning to consider how all the significant infrastructure interventions within proximity of these proposals will work together. As previously noted and as discussed, large scale energy infrastructure is developing in a piecemeal and uncoordinated way. A creative interpretation of what this means for the area and how this may influence the landscape and west St Asaph as a place would help to inform the design of each of the substations and other energy related development. We again urge | The Applicant agrees with the Design Commission for Wales and believes the Denbighshire County Council or Welsh Government are best placed to deliver a landscape-led masterplan for the area, as the Applicant has little to no influence over the landscape mitigation proposals put forward by other developers as part of separate projects.<br>The Applicant would be happy and willing to discuss involvement in such a process should those coordinating organisations bring it forward. |

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| | the key stakeholders to engage in a landscape-led 'masterplanning' approach to the area. | |
| REP5-112.22 | As previously noted in our earlier report, 'A piece of more strategic work could also help to inform some general design principles and design guidance for the area, potentially in the form of an SPG document or similar. It is recognised that with increasing demand for electrical energy, substantial new and expanded National Grid infrastructure and supplier substations are inevitable across Wales, therefore similar strategic work is needed at a national level'. This is a national issue that would benefit from Welsh Government attention. | |
| REP5-112.23 | Concluding Remarks and Next Steps<br>A rigorous process has been undertaken in the land assessment and we previously encouraged a similarly rigorous approach to design that reflects the stated ambitions of the project. Some of that work has been undertaken but much not. The extent of work to date and submitted in the DCO is insufficient to establish any commitments beyond basic mitigation. Whilst it is asserted that there will be no lasting damage, after repair and mitigation, we urge enhancement and a considered design approach to what is in reality an intervention at an urban scale, in a landscape setting. This approach can and should be used to set expectations and specifications throughout procurement and into delivery. | The Applicant maintains that Design Principles show a strong commitment to good design while being proportionate for this stage in the DCO process. The Design Guide will be developed post-consent, in consultation with the Design Commission for Wales, to ensure good design is achieved. |