

MONA OFFSHORE WIND PROJECT

Response to Forsters on behalf of Cefn Estate Deadline 5 Submissions

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Image of an offshore wind farm

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Prepared by:

Dalcour Maclaren

Prepared for:

Mona Offshore Wind Ltd.

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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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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.

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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
km	Kilometres

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

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**1 Response to Forsters on behalf of Cefn Estate
Deadline 5 Submissions**

1.1 Introduction

1.1.1.1 The Applicant has responded to Forsters on behalf of Cefn Estate's response to ExQ2 and Request to attend Compulsory Acquisition Hearing 2 (CAH2) below.

2 Response to Forsters on behalf of Cefn Estate ExQ2 Submission

Table 2.1: REP5-114 Forsters on behalf of Cefn Estate

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	Forsters on behalf of Cefn Estate response	Applicant's response
REP5-114.1	Forsters on behalf of the Executors of the Estate of the Late Sir David Watkin Williams-Wynn Bt	<p>Q2.6.23 The Cefn Estate Can you provide an update on the outcome of the planned meeting with the Applicant? If the scheduled discussion did not take place on 11 November, when it its proposed that the parties will meet?</p> <p>Q2.12.3 Outstanding evidence In your response to the ExA's question Q1.6.24 [REP3-117] you referred to 'plan to follow'. Can you please submit this plan at Deadline 5 so that the ExA may understand the point you are making?</p>	<p>The Applicant has proposed a revised access arrangement/location which is generally more preferable from our perspective (part of the change request being consulted upon), subject to agreement over detail on the precise extent of the corridor. However, discussions around the proposed extent and type of acquisition have ground to a halt after the meeting following the first CAH and we intend to make representations on that point at the hearing on 11 December.</p>	<p>The Applicant acknowledges the Cefn Estate's response regarding the new access as per the Change Request.</p> <p>A meeting was held on the 11 November 2024 with the Cefn Estate, their representatives and the Applicant. The Applicant gave a general update, and the parties then entered further dialogue regarding land take and the high-level terms that had been issued prior to the meeting. Following that meeting there have been numerous exchanges over email regarding the valuation principles for the commercial agreement and the Applicant received comments on the heads of terms on the 19 December. The Applicant will review the comments and respond to the Cefn Estate in the coming weeks to progress negotiations.</p>

3 Response to Forsters on behalf of Cefn Estate D5 Submission- Request to attend CAH2

Table 3.1: REP5-115 Forsters on behalf of Cefn Estate

Planning Inspectorate Ref. No.	Forsters on behalf of Cefn Estate response	Applicant's response
REP5-115.1	<p>Agenda Point 4 (Site-specific representations)</p> <p>Following CAH1, a meeting took place on site with the Applicant on 11 November. A reasonable level of detail was requested from the Applicant to make best use of that meeting, but limited information was supplied, and only at 1602 on 8 November (the Friday before the meeting was due to take place).</p> <p>The most pertinent point raised was the revised access arrangements (for which further consultation closed on 3 December) which was again produced late in the day, with limited opportunity to consider properly. This further highlights the rushed and piecemeal nature of the Application, which was highlighted at the last round of hearings, and continues to be the case.</p> <p>We have had limited engagement since that meeting. We have specifically requested details as to how the Applicant has calculated the terms of the offer presented on 8 November but have received nothing meaningful in response. We cannot be expected to negotiate if we are not being given full details of the proposed offer and its basis. This is incredibly frustrating.</p> <p>There remains significant concern of the extent of the land take proposed. The only justification for</p>	<p>A meeting was held on the 11 November with the Cefn Estate, their representatives and the Applicant. The Applicant gave a general update, and the parties then entered further dialogue regarding land take and the high-level terms that had been issued prior to the meeting on a revised basis as requested by the Cefn Estate</p> <p>The revised access was shown on the land forming part of the Change Request application (CR1-017), and it is noted in the Cefn Estate's submission at deadline 5 (REP5-114) that this access is welcomed and preferred.</p> <p>Following the meeting on the 11 November 2024 there have been numerous exchanges over email with the Applicant responding to questions from the Cefn Estate's representatives regarding the valuation principles for the commercial agreement, and the Applicant received comments on the heads of terms on the 19 December. The Applicant will review and respond to the Cefn Estate in the coming weeks to progress negotiations.</p> <p>As discussed at the meeting on the 11 November 2024, the Applicant has set out its land take requirements and looks forward to discussing these in more detail with the Cefn Estate. It is important to note that the reference to "BNG" in the Cefn Estate's submission (REP5-115) is not correct. Biodiversity Net Gain provisions do not apply in Wales and the land set out in the Order limits is required for the operational substation site and associated access where freehold acquisition is being sought (20.25 acres), cable corridors permanent rights (36.25 acres), temporary mitigation (16.93 acres), screening and long term mitigation which includes both freehold acquisition and rights (64.04 acres) A further 0.18 acres of operational access and 2.59 acres of planting and mitigation land is required over the land owned by Richard Thomas Owen Williams and Timothy Michael Bell which we understand is also part of the Cefn Estate.</p> <p>The offer for a further meeting is welcomed by the Applicant. The Applicant had requested a meeting prior to CAH2 but no response from the Cefn Estates representative was received on this matter. Now that the Applicant has received</p>

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Planning Inspectorate Ref. No.	Forsters on behalf of Cefn Estate response	Applicant's response
	<p>requesting 137 acres of freehold land seems to be “ease” which is not appropriate. This is particularly relevant in relation to the BNG provision, which appears to be solely provided in this location, presumably on the same “ease” basis. Again, that is not appropriate.</p> <p>We are very willing to arrange another meeting to try and reach an agreement, but to do so we need full and proper engagement from the Applicant</p>	<p>comments from the Cefn Estates representative on the terms offered, the Applicant welcomes a further meeting to progress matters.</p>