

# MONA OFFSHORE WIND PROJECT

## Response to Griff Parry Deadline 5 Submission

Deadline: 6

Application Reference: EN010137

Document Reference: S\_D6\_37

Document Reference: MOCNS-J3303-DMC-10511

20 December 2024

F01



Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

**Document status**

<b>Version</b>	<b>Purpose of document</b>	<b>Authored by</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Review date</b>
F01	Submission at D6	Dalcour Maclaren	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	20 Dec 2024

**Prepared by:**

**Dalcour Maclaren**

**Prepared for:**

**Mona Offshore Wind Ltd.**

## MONA OFFSHORE WIND PROJECT

---

### Contents

	<b>RESPONSE TO GRIFF PARRY DEADLINE 5 SUBMISSION .....</b>	<b>1</b>
<b>1</b>	<b>RESPONSE TO GRIFF PARRY .....</b>	<b>1</b>
1.1	Introduction .....	1
<b>2</b>	<b>RESPONSE TO GRIFF PARRY DEADLINE 5 SUBMISSION .....</b>	<b>1</b>

### Tables

Table 1.1:	REP5-113 Griff Parry .....	1
------------	----------------------------	---

## MONA OFFSHORE WIND PROJECT

### 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,

## MONA OFFSHORE WIND PROJECT

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.

## MONA OFFSHORE WIND PROJECT

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).

## MONA OFFSHORE WIND PROJECT

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

## Units

Unit	Description
GW	Gigawatt
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles



## MONA OFFSHORE WIND PROJECT

---

# 1 Response to Griff Parry

## 1.1 Introduction

1.1.1.1 The Applicant has responded to Griff Parry's Deadline 5 submission below.

## 2 RESPONSE TO GRIFF PARRY DEADLINE 5 SUBMISSION

Table 2.1: REP5-113 Griff Parry

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
Q2.01	<p>Question:</p> <p>“Have you got any current, outstanding issues with accessing documents in the Examination Library?”</p> <p>Response:</p> <p>The relevant documents have been able to be located and accessed in the Examination Library. The issue however, was always about getting hard paper copies to the older elderly objectors who have vision impairments and are unable to follow a computer screen. The Promoter’s approach is and was that, despite it being the initiating party and seeking to benefit from its actions to the detriment of those affected, this difficulty was not their concern at all. On this occasion we have managed to progress matters but feel that due to the gravity of what is proposed for those affected by Compulsory Purchase Orders, if for no other reason than a form of “equality of arms” it should be the responsibility of the Promoter to make sure that those affected have every opportunity to understand what is proposed and why, so that they can better contribute to the process.</p>	<p>The Applicant notes the response.</p>
REP5-113.1	<p>2.0 Introduction</p> <p>2.1 These Supplementary Written Rebuttal Submissions are submitted in response to the Promoter’s Document No. MOCNS-J3303-DMC-10372. It is recommended that this document be read alongside the corresponding Promoter’s document above as this will enable easy and rapid comparison to the points seeking to be addressed in this document.</p>	<p>The Applicant responds as set out below. The various references cited are to the replies in Document No. MOCNS-J3303-DMC-10372, unless otherwise indicated.</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>2.2 This document follows the Planning inspectorate’s written submission numbering in the document library and the Promoter’s numbering convention for the issues.</p>	
<p>REP5-113.2</p>	<p>REP3-108.2 – Whether the Promoter has considered Reasonable Alternatives</p> <p>The Promoter now seeks to assert that the EWG meetings were merely high level and that the site selection process was “reset” thereby commencing in earnest following the National Grid POI Bodelwyddan decision.</p> <p>This assertion obviously suits the Promoter’s narrative however it is patently incorrect for the following non exhaustive reasons:</p> <p>1) The EWG Minutes (See Appendix 1) do not contain any qualifying caveats and are extremely unambiguous. There is no suggestion that the information presented was an “early indication” or “initial findings” instead the language used throughout is very bold and clear and assertive, for instance:                      “...each POI had several landfall options, except Bodelwyddan, which has only one landfall option.” Rather than a more non-committal assertion such as: “..... except Bodelwyddan, which is believed to have only one landfall option.”</p> <p>2) Dalcour Maclaren commenced landowner contact and land referencing in March 2022 which aligns perfectly with when a Bodelwyddan POI was selected.</p> <p>3) The Promoter, belatedly, now asserts that it simultaneously pressed “reset” and started carrying out an entirely new landfall and onshore route search.</p> <p>4) Table 4.14 in PEIR (pp32-33) shows the 5 landfall zones considered and paragraph 4.8.4.5 of PEIR show how this table shortlisted Llanddulas landfall.</p>	<p>The Applicant confirms the Expert Working Groups were established to discuss topic-specific issues with relevant stakeholders and to facilitate ongoing communication and feedback. By their nature, they were high level and issues have evolved, as the Scheme has developed.</p> <p><b>Point 1</b></p> <p><b>REP3-108.2 &amp; REP3-108.4</b> The meeting on 13th December 2021 was a high-level discussion regarding the options understood at that time regarding the potential offshore export cable route options available for each Point of Interconnection (POI). The project initially considered six POIs; these are summarised in Section 4.8 of Site Selection and Consideration of Alternatives (AS-016). The EWG Steering Group is an offshore focussed meeting with the intention of coordinating the appropriate inputs required for the Evidence Plan Process. The meeting on 13th December 2021 was a high-level discussion regarding the options understood at that time regarding the potential offshore export cable route options available for each Point of Interconnection (POI).</p> <p>The suggestion made is refuted and it is made clear from the outset of the minutes contained in the <b>Technical Engagement Plan Appendices Part 1 (A to E) (Document Number: MOCNS-J3303-RPS-10029)</b> that these are high level, as the introduction to these minutes clearly state...</p> <p><i>‘This meeting is to introduce the cable route study for Morgan and Mona, to procure high level feedback on the cable routing process and to identify any red flags..... Further information will be provided, and more detailed consultation will take place next year when the projects have their grid connections.’</i></p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>5) However this was already clearly known by the Promoter prior to the December 2021 EWG meeting and nothing had changed since that time. For instance, hard constraints such as the Constable Sandbank, Douglas gas field and its landfall, Gwynt Y Mor, Awel y Mor, Burbo Bank, and Rhyl Flats arrays and their landfalls were all known about prior to the December 2021 EWG.</p> <p>6) Paragraph 4.8.3.23 of PEIR (pp28) shows how, even after the purported “reset” (which presumably started in March 2022), that by (ie before) July 2022 in any event West A offshore route had been selected meaning that only Llanddulas East A and 65% identical Llanddulas East B had been selected.</p> <p>The facts therefore remain that:</p> <ul style="list-style-type: none"> <li>• In March 2022, National Grid rather than the Promoter selected 65% of the current onshore route including The Objectors plots; and</li> <li>• The Promoter only ever really considered and consulted on the 35% difference between Llanddulas East A and 65% identical Llanddulas East B both of which are identical so far as the Objectors’ plots are concerned;</li> <li>• Notwithstanding that the proposed route was determined before December 2021, given that no other options were considered (despite reasonable alternatives being available) then the route was clearly “pre-determined”;</li> <li>• Notwithstanding that the Promoter withheld this information 65% of the route went beyond a formative stage in March 2022 with the Bodelwyddan decision and thereby consultation that took place about various landfall options and other routes was meaningless and does not satisfy the Sedley Gunning Principles or the Promoters obligations and duties under sections 42 to 49 of the Planning Act 2008 and all associated guidance; and</li> <li>• The objectors do not find it credible that any such “reset” took place and in any event would have been doomed as none of the hard constraints that were clearly know about before December 2021 had ever changed.</li> </ul>	<p>Section 2 further explains... <i>‘At the moment the applicant is awaiting a decision from the Offshore Transmission Network Review (OTNR) which will inform the grid connection for both projects’</i></p> <p>Furthermore, section 3 explains on site selection that... <i>‘Reasonable alternatives have also been presented as we are looking for very early feedback and will be looking for more detailed feedback when the POI for each project is known. It will be possible to go back to the mapping stages of the selection study following stakeholder feedback’.</i></p> <p><b><u>Point 2</u></b></p> <p>It would be entirely sensible that focused engagement would commence once the Point of Interconnection was selected.</p> <p><b>(REP3-108.6)</b> Dalcour Maclaren on behalf of the Applicant looked to meet with all landowners potentially impacted by the cable corridor ahead of both the non-statutory and statutory consultations to ensure feedback was captured and landowners were aware they had the chance to feed into these consultations. First contact with Mr. Parry was on the 15 March 2022 (ahead of the non-statutory consultation process) when a letter was sent to introduce the scheme and contained a request for completion of a Land Interest Questionnaire and a non-intrusive access licence, with subsequent engagement, as set out in the latest Land Rights Tracker (S_PD_5 F08).</p> <p><b><u>Point 3</u></b></p> <p><b>(REP3-108.2, REP3-108.4, REP3-108.6, REP3-108.7)</b> Confirm that any high-level site selection undertaken before the confirmation of the POI was superseded once National Grid confirmed the POI. The site selection and consideration of alternatives process restarted at that stage and all potential alternatives were fully appraised. The consideration of landfall alternatives is outlined in <b>Section 4.10.4 of AS-016.</b></p> <p>No decision on the landfall or onshore cable route (or onshore substation) was taken until the rounds of non-statutory and statutory consultations had</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		<p>been completed. Details of the non-statutory and statutory consultations are within the Consultation Report (APP-037), which includes a summary of responses received.</p> <p><b>Points 4, 5 &amp; 6</b></p> <p><b>REP3-108.4</b> The Applicant's consultation for the DCO was in compliance with the Sedley Gunning principles. Furthermore, it has adhered with the legal obligations arising from sections 42, 47 and 48 of the Planning Act 2008 and has had due regard to responses raised, in compliance with section 49 of the Planning Act 2008, taking account and applying refinements where able to, so as to incorporate feedback received. The Consultation Report (<b>APP-037</b>) details the robust measures undertaken by the Applicant and furthermore, the Applicant's Response to Relevant Representations (<b>PDA-008</b>) sets out further detail as regards the process followed and compliance with the legal requirements.</p> <p>The project initially considered six POIs; these are summarised in Section 4.8 of Site Selection and Consideration of Alternatives (<b>AS-016</b>). The Applicant notes that National Grid confirmed the POI for the Mona Offshore Wind Project to be Bodelwyddan Substation in Denbighshire in 2022. Any high level site selection undertaken before the confirmation of the POI was superseded upon confirmation from National Grid. The site selection and consideration of alternatives process was reset at that stage and all potential alternatives were fully appraised. The consideration of landfall alternatives is outlined in Section 4.10.4 of AS-016.</p>
REP5-113.3	<p>REP3-108.3 – Alternative Routes</p> <p>The Objectors did in fact raise the prospect of the alternative alignments A to E during the “consultation” period as explained previously in section 11.1 of the August 7th Submission. Due to the predetermination issue. this unwelcome suggestion was dismissed out of hand with the response received on 11/09/2023 being as follows:</p>	<p>The Applicant can categorically confirm that there was no ‘predetermination’, and the decision on the route was based on the BRAG process and planning merits, accounting for identified constraints and factoring in consultation responses, allowing for project requirements.</p> <p><b>REP3-108.4</b> There was appropriate consideration of alternatives and any high level site selection undertaken before the confirmation of the POI was</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>“..... that to go to the south of the line, we would need to cross an additional road and then be running parallel between the pylon route in your land and the one just to the south, which again would be very limiting.”</p> <p>In its current Deadline 4 response, the Promoter goes on to dismiss these alternative routes on the basis of them being only 12m wide however the markups shown in section 10.3 of the Augst 7th Submission showed the full 100m working corridor and made no comment on the permanent easement width to be 12m although it is evidenced in that and subsequent submissions that the cables could comfortably be accommodated within that width. However, the Promoter has the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 at its disposal which would not limit the potential easement to 12m. It is clear however that a 30m easement width is certainly excessive.</p> <p>Options A-C are only modestly longer than the existing route by @ 1% of the route whilst alignments D and E in fact are in fact between 90M and 178M (also some 1% of the route) shorter entirely in line with section 4.4 of AS-016.</p> <p>In addition, the alternative landowners affected are prepared to cooperate and in any event the Promoter can rely on the associated Infrastructure Planning (Compulsory Acquisition) 2010 Statutory Instrument, as indeed it already is for land on Cefn Estate near the substation site. Alternatives A to E are therefore “reasonable alternatives” which have still not been considered by the Promoter thereby putting is at odds with its statutory obligations under its enabling egislation and guidance (See Objectors Response in REP1-083.2 of September 30<sup>th</sup> Rebuttal).</p> <p>The Promoter claims that drawings of Robert Parry’s plans were not shared before deadline 1. However, the Promoter was fully informed throughout “consultation” that “plans were being developed for this land” as well as the fact that the Objectors had received approaches for outright purchase for caravan site extensions as well as a cycling hub and for solar generation.</p> <p>Notwithstanding the above and even with copies of Robert Parry’s proposals, the Promoterhas, in any event, confirmed as recently as 28/11/2024 that it is unwilling to accept any constraints on its scheme that would enable both schemes to co-exist.</p>	<p>superseded upon confirmation from National Grid. The site selection and consideration of alternatives process was reset at that stage and all potential alternatives were fully appraised.</p> <p><b>REP3-108.4</b> The Applicant’s consultation for the DCO was in compliance with the Sedley Gunning principles. Furthermore, it has adhered with the legal obligations arising from sections 42, 47 and 48 of the Planning Act 2008 and has had due regard to responses raised, in compliance with section 49 of the Planning Act 2008, taking account and applying refinements where able to, so as to incorporate feedback received. The Consultation Report (APP-037) details the robust measures undertaken by the Applicant and furthermore, the Applicant’s Response to Relevant Representations (PDA-008) sets out further detail as regards the process followed and compliance with the legal requirements.</p> <p><b>REP3-108.6</b> No decision on the landfall or onshore cable route (or onshore substation) was taken until the rounds of non-statutory and statutory consultations had been completed. Details of the non-statutory and statutory consultations are within the Consultation Report (APP-037), which includes a summary of responses received.</p> <p><b>REP3-108.2</b> The consideration of landfall alternatives is outlined in Section 4.10.4 of AS-016, were identified following the site selection principles identified in Section 4.4 of AS-016. These are identified as: • Shortest route preference to reduce impacts by minimising footprint for the Mona Offshore Cable Corridor and Access Areas and Mona Onshore Cable Corridor as well as considering cost (hence ultimately reducing the cost of energy to the consumer) and minimising transmission losses • Avoidance of key sensitive features where possible, and where not, ensure mitigation of impacts • Minimise the disruption to populated areas. The onshore cable routes took account of relevant constraints and shortening the route as much as possible. Those areas not considered were primarily driven by infeasible topography. Section 4.10.5 includes an appraisal of all alternatives and why particular routes were considered infeasible. The Applicant considers that the</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		<p>landfall and onshore cable route consideration of alternatives were robust and appropriate.</p> <p><b>REP3-108.3</b> The Applicant notes in response to REP3-108.3 that the alternatives proposed are not reasonable alternatives and that therefore it is appropriate that the project has not considered them previously. Alternative routes A and B would also require the use of compulsory acquisition powers (as outlined in Issue Specific Hearing 5). Alternatives routes C, D and E were addressed in REP3-108.2 and it was concluded that they are not reasonable alternatives for consideration due to the requirement to constrain the project parameters.</p> <p><b>REP3-108.4</b> The design of the Mona Offshore Wind Project has been refined following the statutory consultation to reduce the extent of land take required (see ES Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016)). The Applicant has also demonstrated the necessity and proportionality in terms of site selection and the interference with the rights of those with an interest in the land. Considering the above, the Applicant considers there is a compelling case in the public interest for the authorisation of the compulsory acquisition of land and that the interference with private interests in land is justified</p> <p><b>REP3-108.29</b> The Applicant can confirm that the proposed 12m permanent cable easement width would be insufficient. The Applicant reiterates its responses at REP1- 083.35 and REP1-083.36 of its Deadline 2 Submission - S_D2_3.4 Appendix to Response to WRs: Griffith Parry, Robert Parry, Kerry James F01 (REP2-082) in that the dictating factor for trench separation and therefore the permanent cable easement width, is not the width of the open-cut trench, but rather the distance (centre-to-centre) between cable circuits. This separation is necessary due to the heat dissipation requirements of the export cable at depth. The 2.5m maximum trench width at surface and 7.5m separation between cable centres are indicative and the final dimensions are subject to existing ground conditions and will be developed during the detailed design stage. If the ground conditions are suitable, the overall trench width and separation may be reduced, this is in line with the Applicant's</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		<p>ongoing obligations to only compulsorily acquire land or rights in land that are reasonably required for the development of the Mona Offshore Wind Project.</p> <p><b>REP3-108.53</b> The Applicant notes the proposed site layout plans which were provided by Kerry James at Deadline 1 (REP1-084). Following the meeting on 17th September 2024 and detailed discussion of the site layout plans, the Applicant will continue to discuss the Head of Terms with Messrs. Parry and explore how the two schemes could co-exist.</p>
REP5-113.4	<p>REP3-108.4 – Consultation</p> <p>The route was predetermined and alternatives were not considered as set out in REP3-108.2 and REP3-108.3 as well as in the Objectors previous response to REP1-083.3 in the 30<sup>th</sup> September Rebuttal. The route was beyond a formative stage prior to any “consultation” so that even when consultation comments submitted in good faith were received then they could not be meaningfully taken account of and indeed were not (see email response dated 11/09/20213 in REP3-108.3 earlier).</p>	Please see response to REP5-113.3 above.
REP5-113.5	<p>REP3-108.5 – Rochdale Envelopes</p> <p>The point being made here is that, whilst the Promoter was fully aware from March 2022 that there was only one possible landfall point and thereby only two 65% identical onshore routes, it unilaterally withheld this information and simulated consultation on already eliminated and unachievable points of landfall and route corridors through 2 bouts of non-statutory consultation and to even present vague obfuscated route information in its scoping report to the Planning Inspectorate.</p>	<p>This is not the case, as the Applicant confirmed at <b>REP3-108.2</b>: <i>the National Grid confirmed the POI for the Mona Offshore Wind Project to be Bodelwyddan Substation in Denbighshire in 2022. Any high-level site selection undertaken before the confirmation of the POI was superseded upon confirmation from National Grid. The site selection and consideration of alternatives process was reset at that stage and all potential alternatives were fully appraised.</i></p> <p>The consideration of landfall alternatives is outlined in Section 4.10.4 of AS-016. The onshore cable route options considered within the Preliminary Environmental Information Report (PEIR), and reconsidered within AS-016, were identified following the site selection principles identified in Section 4.4 of AS-016.</p>
REP5-113.6	<p>REP3-108.6 – Route Search “Reset” and Discussions with Objectors</p> <p>These exchanges between Mona and the Objectors cannot be defined as “consultation” as the Promoter merely used them as opportunities to present</p>	The Applicant reiterates that:



Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>its Scheme and its requirements, disregarding any affected parties' concerns and requests whilst referring to CPO powers in a thinly veiled attempt to portray the impression that matters are already finalised and inevitable and that it was pointless to resist. The Promoter continues to try to strongarm the Objectors into its Heads of Terms and has confirmed as recently as 28/11/14 that it is unwilling to accept any constraints on its scheme that would enable both schemes can co-exist. Their proposal, therefore, as it currently stands, represents the total loss of Robert Parry's scheme.</p>	<p><b>REP3-108.44</b> The Applicant has consulted and updated affected parties as part of the DCO process and will continue to constructively engage.</p> <p><b>REP3-108.4</b> The Applicant has acted lawfully in undertaking consultation for the DCO, in compliance with the Sedley Gunning principles. Furthermore, it has adhered with the legal obligations arising from sections 42, 47 and 48 of the Planning Act 2008 and has had due regard to responses raised, in compliance with section 49 of the Planning Act 2008, taking account and applying refinements where able to, so as to incorporate feedback received. The Consultation Report (APP-037) details the robust measures undertaken by the Applicant and furthermore, the Applicant's Response to Relevant Representations (PDA-008) sets out further detail as regards the process followed and compliance with the legal requirements.</p> <p><b>REP3-108.6</b> Dalcour Maclaren on behalf of the Applicant looked to meet with all landowners potentially impacted by the cable corridor ahead of both the non-statutory and statutory consultations to ensure feedback was captured and landowners were aware they had the chance to feed into these consultations.</p> <p><b>The Land Rights Tracker</b> sets out the engagement with land interests, which confirms the latest position (S_PD_5 F08).</p>
<p>REP5-113.7</p>	<p>REP3-108.7 – Route Search “Reset”</p> <p>The Objectors refer the Panel to their response in REP3-108.2. Events, timescales and basic facts simply do not support the Promoter's assertion that a “reset” of the site search took place took place.</p> <p>Subject to Bodelwyddan POI decision, the route alignment had subject to the POI decision, passed beyond a formative stage before the December 2021 meeting and all subsequent consultation (save for the 35% difference between Llandudno East A and B at the statutory consultation stage) were merely a meaningless gesture for the sake of the Promoter's DCO application.</p>	<p>Please see response to REP5-113.5 above.</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>The Objectors have provided a detailed analysis of the alternatives in section 10.3 of the August 7th Submission and clearly these alternatives are entirely reasonable.</p>	
<p>REP5-113.8</p>	<p>REP3-108.13 – Compound and Working Area</p> <p>The August 27th Supplementary Submissions demonstrates how wasteful and unnecessary a proposed 35,000M2 compound would be as would the need for a 100M wide or even a 74 Metre wide working area. This amount of land is not “required” as it is simply not “necessary for the accomplishment of the Scheme” as has been explained in Sections 9.2.3 and 12 of the August 7th Submission and in the August 27th Supplementary Submissions and in the Objectors response to REP1-083.30 submitted at Deadline 3.</p> <p>Further, Deadline 4 Post hearing submission, Comments on CAH01 Hearing Points also explained how the excessive land within the Limits of Deviation could not be classified as being “required to facilitate” or be “incidental” to the development due to the very different meaning of those terms which the Promoter sought to obfuscate at the CAH01 hearing.</p> <p>Orders authorising excessive amounts of land only give rise to huge inefficiencies, for instance, inappropriate siting of scheme haul roads and having soil bunds that are many metres in width and length whilst only being 60cm in height.</p>	<p>As the Applicant has previously set out, land is required at this location to facilitate a temporary construction compound (TCC3), and further details on activities at these compounds can be found at paragraphs 3.7.2.33 to 3.7.2.39 of the Environmental Statement – Volume 1, Chapter 3: Project Description (APP-050). With specific reference to temporary construction compound 3, TCC3 is crucial for the west/northern section of the Onshore Cable Corridor, as it is located on the arterial transport route, providing critical HGV access routes, cable drum vehicle access routes and staff/workforce access routes, as stipulated in the Outline Construction Traffic Management Plan (APP-225). In relation to the footprint of TCC3, the required area of the compound will accommodate site offices, welfare facilities, export cable laydown and storage, material and plant laydown and storage, site parking, site security, as aforementioned in the Project Description (APP-050). Trenchless drilling techniques will also be undertaken at this working area, so the necessary area is required for the drill rig machinery, associated equipment, the drill entry and exit pits and the safe working requirements during construction.</p> <p>The Applicant refers to the definition of Work No. 13 in the draft Development Consent Order (C1 F07) as “temporary construction compounds and laydown areas with a total maximum area of 37,500 m<sup>2</sup> and access to Work Nos. 12 and 14 during construction including works to the public highway and visibility splays”.</p> <p>As detailed in the Project Description (APP-050) at 3.7.2.14, “The Mona Onshore Cable Corridor will be up to 74 m wide (including the temporary construction width) to allow up to four cable circuits to be installed in localised stretches of the Onshore Cable Corridor, the total width may be increased to 100 m (e.g. trenchless technique crossings)”. The width of the onshore cable corridor is shown on the Works Plans (AS-003) within the Order Limits. 3.7.2.16 clarifies that “Once installed, the cables will occupy a permanent easement approximately 30 m wide, although the easement may be wider where obstacles are encountered or where cables are installed</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		using trenchless techniques.” The exact location of the permanent easement will be ascertained following installation of the cables determined by detailed design post-consent.
REP5-113.9	<p>REP3-108.16 – Access Gate off A548 and Robert Parry Proposals</p> <p>Again, the Objectors have been candid throughout regarding the A548 gateway and their proposals for the land however the Promoter seems to be implying that information has been withheld from them. The Objectors are not responsible for Promoters ability to pay attention nor its powers of observation.</p>	<p>There was no suggestion that information has been withheld, merely a statement confirming factually that the Applicant was not previously aware of the existence of the field gate and that it is very well used.</p>
REP5-113.10	<p>REP3-108.17 – Notice Serving period</p> <p>Section 16.2 of the August 7th Written Submissions and REP1-083.13 and REP1-083.14 in the September 30th rebuttal deal with the Promoter’ desire for a 7 year notice serving window.</p> <p>The Promoter has still offered no justification for a 7 year notice period beyond stating “The Scale of development and needs of the project” and again seeks to rely on the precedents of other projects, where the matter had never been challenged, which are irrelevant.</p> <p>In the same way as excessive land included in the Order will merely encourage wasteful deployment of that scarce and valuable resource (see REP3-108.13 above) then permitting excessive time will also merely encourage the Promoter to waste it with little regard to the impact on those affected by its actions.</p>	<p><b>REP3-108.17</b> The time period is justified in the Explanatory Memorandum (REP2-006), which confirms that a seven-year time limit is considered appropriate and necessary for the Mona Offshore Wind Project, given the complexity, scale and needs of the project. The seven-year time limit reflects the scale of the development and is preceded for other offshore wind DCOs.</p>
REP5-113.11	<p>REP3-108.18 – Notice Serving period / Handback / Advance Compensation Payments</p> <p>REP3-108.17 refers and Article 29(4) only provides for handback 12 months following works completion. There is nothing in the Order to safeguard the Promoter prolonging the “works phase” indefinitely again leaving landowners powerless to the whims of the Promoter. Contrary to the Promoter’s assertion, the Powers sought in terms of both timescale and extent of land</p>	<p><b>REP3-108.18</b> As set out in Article 29(4) of the draft DCO, any land only needed for construction must be handed back and restored to the reasonable satisfaction of the landowner, and pursuant to Article 29(3), this must be within 12 months of completion of the relevant work, unless otherwise agreed with the owners of the land. There is no desire by the Applicant to prolong the works, nor would it be in the best interests of the Scheme.</p> <p>The Applicant confirms that the e-mail was responding to a request to change the cables and the response was that the project is unable make a</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>are entirely disproportionate and unnecessary and unjustifiable for the needs of the project.</p> <p>The Promoter continues to try and coerce the Objectors into its Heads of Terms yet it has confirmed as recently as Thursday 28/11/2024 that it is unwilling to accept any constraints on its scheme that would enable both schemes to co-exist. Contrary to the Promoters assurance that the powers are a “fall back measure”, it actually sees the powers as a means of not having to negotiate and be considerate towards accommodating the Objectors requirements. The Promoter again seeks to mislead the Panel by advising that Section 52 of the Land Compensation Act 1973 permits claimants to claim advanced compensation as soon as the DCO is authorised. Whilst the Claimant can make such a claim, the Promoter would not be obliged to release the payment until entry is taken following service of a Notice to Enter or vesting Declaration which of course, could be many years hence (REP3-108.17).</p> <p>REP3-108.21 – Land Required / Working Area / Permanent Easement</p> <p>The Objectors refer the Panel to their response to REP3-108.13 above.</p>	<p>commitment on the alignment of the cable route at this time. However, the Applicant’s land agent did explain ... ‘we are keen to progress negotiations and discussions where both the Mona Offshore Wind Farm and your development proposals can co-exist’... ‘I hope that in the meantime we can come to agreement on the other terms within the voluntary agreement. The Applicant is committed to engaging constructively on the proposals and a response is awaited.</p> <p>REP3-108.18 correctly explained that Section 52(1) of the Land Compensation Act 1973 provides the right to claim advance payment as soon as the DCO is authorised. In line with recommended practice, acquiring authorities are encouraged to issue a claim form to potential claimants at the earliest opportunity and this is the approach that the Applicant proposes to follow. Further communication on payments will be communicated to all affected parties, including as regards advance payments.</p> <p>REP3-108.37 Explained the requirement for a permanent easement width of 30 metres. The dictating factor for trench separation and therefore the permanent cable easement width, is not the width of the open-cut trench, but rather the distance (centre-to-centre) between cable circuits. This separation is necessary due to the heat dissipation requirements of the export cable at depth. These requirements, in conjunction with the given calculations, will confirm the onshore export cable specification during the detailed design stage. The 2.5m maximum trench width at surface and 7.5m separation between cable centres are indicative and the final dimensions are subject to existing ground conditions and will be developed during the detailed design stage. If the ground conditions are suitable, the overall trench width and separation may be reduced, this is in line with the Applicant’s ongoing obligations to only compulsorily acquire land or rights in land that are reasonably required for the development of the Mona Offshore Wind Project.</p>
<p>REP5-113.12</p>	<p>REP3-108.22 – Compelling Case in the Public Interest</p> <p>The Objectors refer the Panel to Sections 9.2.1 and 13 of its August 7th Submissions, its response at REP1-083.18 in the 30th September Submission and Section 3.3 of CAH01</p>	<p>The Applicant’s CA hearing summary (S_D4_3) and Statement of Reasons (REP2-004) sets out the Applicant’s justification for seeking powers of compulsory acquisition and confirms that a compelling case exists in the public interest which justifies the making of the DCO with those powers.</p>

**MONA OFFSHORE WIND PROJECT**

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>Hearing Points Summary Submitted by Deadline 4. The Promoter has merely referenced underlying national policy and legislation and guidance yet makes no link as to how the project achieves or meets them regardless of whether or not it does so in a “compelling” manner. More concerning is the fact that the Promoter has given absolutely no consideration or mention whatsoever throughout its documentation of the harm done to those affected by its scheme.</p> <p>In the CAH01 hearing the Promoter seemed to state that it was for the Secretary of State to make the case rather than the Promoter however this is not correct as is made clear in part 2) of the Deadline 4 Submission - Comments on CAH01 Hearing Points.</p>	<p>In this respect, the scheme is not only a nationally significant infrastructure project, it will also provide significant new renewable energy generation and the compelling case presented outweighs the harm and justifies interference to affected parties. Furthermore, appropriate mitigation is secured through the DCO.</p>
<p>REP5-113.13</p>	<p>REP3-108.23 – Funding</p> <p>The Objectors note the Promoter’s iterative response however their contention is that whilst the parent companies may have sufficient funding, the Mona SPV certainly does not and neither does it have any form of charge or lien or contract or rights whatsoever over those funds in the parent companies and without some form of binding agreement between the subsidiary and the parent company then the assurance of an unfunded subsidiary /SPV alone is totally meaningless and no weight can be attributed to it.</p> <p>The Objectors’ concern here is that, in the likely event of a dispute or disagreement over the drawdown or many other issues that could arise here, then the project is seeking to allow itself an excessive timescale to enable a longstanding dispute to take place again at the cost of affected landowners who will simply be left in limbo with no recourse whatsoever.</p>	<p>Whilst noting the comments raised, the Applicant wishes to underline that this is a viable Scheme, necessary and justified in the public interest and subject to approval of the DCO, further communication can be shared on proposals concerning implementation and project delivery. Additionally, safeguards have been factored in as part of the DCO, regarding security and redress, including the entitlement to compensation for affected landowners.</p> <p><b>REP3-108.23</b> The Applicant confirms that adequate funding is available to enable the compulsory acquisition within the statutory period following the DCO being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken into account. Further, the Applicant can confirm that the Mona Offshore Wind Project understands the requirements set out in paragraphs 17 and 18 of the Planning Act CA guidance. As explained in the Explanatory Memorandum (REP2-006), Article 33 of the DCO provides that the Applicant may not exercise a number of powers prior to it putting into place a guarantee or security equal to its potential liability to compensation payable under the DCO, to be approved by the Secretary of State. This article is preceded in a number of DCOs and Article 33(5) allows the Applicant to demonstrate to the Secretary of State that neither a parent company guarantee, nor alternative form of security is required because the undertaker is sufficiently funded to meet any liability to pay compensation pursuant to the DCO.</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-113.14	<p>REP3-108.29 – Alternatives D and E</p> <p>The Objectors refer the panel to sections 9.2.1 and Section 10 of the August 7th Submissions as well as previous response in REP1-083.2 and Appendix 01 in the September 30<sup>th</sup> Rebuttal as well as sections 4.3.5 to 4.3.8 of the CAH01 Hearing Points Summary Submitted by Deadline 4.</p> <p>The purported 12m easement is addressed in REP3-108.3 above. In other discussions with the Promoter the Objectors have attempted to discuss possible easement widths of 15, 18, 20m and more but the Promoter has flatly declined to accept any constraints (ie less than 30m) on its project as recently as 28//11/2024.</p> <p>Alternatives D and E undoubtedly have several advantages over the current alignment yet the Promoter continues to unreasonably refuse to agree to consider them contrary to the requirements of the enabling legislation that it is seeking to rely on.</p>	<p><b>REP3-108.38</b> explains the requirement and justification for a width of 30 metres to accommodate the cable circuits. It explains that the dictating factor for trench separation and therefore the permanent cable easement width, is not the width of the open-cut trench, but rather the distance (centre-to-centre) between cable circuits. This separation is necessary due to the heat dissipation requirements of the export cable at depth. These requirements, in conjunction with the given calculations, will confirm the onshore export cable specification during the detailed design stage. The 2.5m maximum trench width at surface and 7.5m separation between cable centres are indicative and the final dimensions are subject to existing ground conditions and will be developed during the detailed design stage. If the ground conditions are suitable, the overall trench width and separation may be reduced, this is in line with the Applicant's ongoing obligations to only compulsorily acquire land or rights in land that are reasonably required for the development of the Mona Offshore Wind Project</p> <p><b>REP3-108.3</b> In terms of the alternative routes put forward by the Objector... ' alternative routes proposed C, D and E require the onshore cable route to reduce its required permanent easement from 30m to 12m. This requirement to reduce the necessary width means that these three alternatives are not reasonable alternatives for consideration. Alternative routes A and B require third party land that would require compulsory acquisition,</p>
REP5-113.15	<p>REP3-108.32 – Printed Materials Deposited at libraries.</p> <p>The Objectors have been fascinated to read the Promoters claims here and would very much like to receive copies of the photographs and signed receipts.</p> <p>On this subject the Objectors also wonder why materials were not deposited at Abergele Library being by far the nearest library to the point of landfall as well as the Bodelwyddan POI.</p>	<p>The libraries used as deposit locations were chosen to give broad coverage across North Wales, for as many people as possible who wished to access the information. While the Abergele library was not used, all of the residents and businesses of Abergele were sent a consultation postcard to advise them of the consultation and how to access materials. In addition, advertisements were also placed in the Daily Post and the materials were available on the Applicant's project website. If anyone had trouble accessing the information they were advised to contact the Applicant who would assist them with accessing the information.</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		<p>More information on the consultation, the methods used for advertising, and consultation zone can be found in the Consultation Report (APP-037).</p>
<p>REP5-113.16</p>	<p>REP3-108.33 – Width of Working Corridor / Trench Widths</p> <p>The Objectors refer the Panel to Section 12 of the August 7th Written Submissions and its 27th August Supplementary Submission and REP3-108.13 above. The Objectors assert that there is ample scope to reduce the limits of deviation to much more reasonable levels in line with the actual needs and requirements towards the actual accomplishment of the project in line with the legislation and caselaw.</p>	<p><b>REP3-108.21</b> As previously stated in its Deadline 3 written response (REP3-040), the Onshore Cable Corridor width is presented as a maximum design scenario in line with the Project Design Envelope approach. The Applicant maintains that a 74 m cable corridor is required to accommodate all elements of the onshore cable construction (excluding trenchless technique crossings). However, during detailed design, if conditions allow, this will be reduced where possible in line with the Applicant’s ongoing obligations to only compulsorily acquire land or rights in land that are reasonably required for the development of the Mona Offshore Wind Project. The haul road has been indicatively shown centrally within the Onshore Cable Corridor, as shown on the Deadline 1 Submission - S_D1_5.6 Appendix to Response to Hearing Action Point: Indicative onshore cable corridor crossing section and trenchless technique crossing long-section F01 (REP1-018), as this approach minimises the amount of construction traffic movements on the subsoils and is typically used on other cross-country cable route projects. The haul road width and location within the Onshore Cable Corridor will be confirmed during the detailed design stage and will be influenced by topography and existing ground conditions. In the meeting held between the Applicant and Messrs. Parry on the 17 September 2024, it was agreed that the potential use of higher capacity cables, in order to reduce cable separation, could have been adopted but that this would significantly increase the cost of the cables in conflict with one the key project objectives of designing an efficient and economic transmission system. As is usual for this type of AC project, the scheme has been designed on the basis of the onshore export cables having a maximum voltage of 275kV (see Table 3.29, Maximum design parameters for onshore export cables in F1.3 Environmental Statement - Volume 1, Chapter 3: Project Description (APP050)). This ensures the project is deliverable and is an efficient and economic system.</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-113.17	<p>REP3-108.38 – Electrical Separation</p> <p>The Promoter has accepted that higher capacity cables and better quality will reduce resistance (and thereby heat production) and heat dissipation thereby enabling trench separation distances to be reduced but they have already advised that this will not be considered as it will drive up the cost to the project (meeting of 17th September 2024).</p>	<p><b>REP1-083.35</b> The cable specification and formation (flat or trefoil) and the physical parameters of the installation works will not be determined until the detailed electrical design phase is undertaken by the principal contractor. Regarding the trefoil or flat cable formation, trefoil formation is less effective at dissipating heat than the flat formation, therefore the trench separation centre-to-centre is assumed to be a worst case based on flat cable formation.</p> <p><b>REP1-083.36</b> The onshore cable corridor is wider for such trenchless technique crossings, as cables installed via trenchless techniques are generally at a greater depth and require greater separation than cables installed near the surface using trenched techniques. The onshore export cables generate heat, which must be adequately dissipated into the surrounding soil in order to prevent overheating. Heat dissipation is dependent on the cable burial depth, surrounding soil thermal characteristics and cable specification. Hence, the increase in cable separation distances required to effectively regulate heat dissipation. The Applicant can only provide an indicative cross-section at this time as the cable specification and formation (flat or trefoil) and the physical parameters of the installation works will not be determined until the detailed electrical design phase is undertaken by the principal contractor.</p> <p><b>REP3-108.38</b> The dictating factor for trench separation and therefore the permanent cable easement width, is not the width of the open-cut trench, but rather the distance (centre-to-centre) between cable circuits. This separation is necessary due to the heat dissipation requirements of the export cable at depth. These requirements, in conjunction with the given calculations, will confirm the onshore export cable specification during the detailed design stage. The 2.5m maximum trench width at surface and 7.5m separation between cable centres are indicative and the final dimensions are subject to existing ground conditions and will be developed during the detailed design stage. If the ground conditions are suitable, the overall trench width and separation may be reduced, this is in line with the Applicant's ongoing obligations to only compulsorily acquire land or rights in land that are reasonably required for the development of the Mona Offshore Wind Project.</p>



Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-113.18	<p>REP3-108.41 – Compelling Case</p> <p>The Objectors would refer the Panel to REP3-108.22 above.</p> <p>The Objectors would like nothing better than to engage in some constructive dialogue with the Promoters to ultimately agree how the two schemes can co-exist however despite being sent Robert Parry’s CAD files on 29/09/2024 some 9.5 weeks ago. To date, nothing has so far been forthcoming and indeed the last contact with the Promoters was an email of 28th November advising that they are unable to accept any constraints on their project at the present time. Instead they again seek only to promoter their very onerous heads of terms.</p>	<p>Please see response to REP5-113.11 and REP5-113.20 - the Applicant awaits a response to the heads of terms from Mr. Parry.</p>
REP5-113.19	<p>REP3-108.43 – Impediments to Scheme.</p> <p>The US writer and philosopher Upton Sinclair is attributed with the quote: “It is difficult to get a man to understand something when his salary depends on his not understanding it.”</p> <p>There are numerous impediments that are likely to trouble this scheme in the future. For instance, the Promoters failure to comply with the basic requirements of its enabling legislation as the Objectors have highlighted throughout as well as its requirements to seek excessive unnecessary land and unlawful temporary powers to boot mean that, even if the Secretary of State erroneously decides that the “ends justify the means” and confirms the Order then it remains highly vulnerable to further challenge.</p>	<p>The Applicant confirms the application has been promoted in compliance with statutory requirements and the applicable DCLG ‘Planning Act 2008 Guidance and a compelling case in the public interest exists to justify the powers sought. Furthermore, it has no reason to believe that there are any physical or legal impediments to implementation of the Scheme.</p> <p><b>REP3-108.3</b> explains that the powers sought are necessary in the circumstances of the case and, as explained at the CAH1 hearing by seeking temporary possession powers over the whole Order Land with permanent rights or acquisition only over the as-built project, the Applicant’s approach is to ensure that the land and rights in land to be acquired are no more than is reasonably required for the purposes of the project. Therefore, they are necessary and proportionate.</p>
REP5-113.20	<p>REP3-108.51 – Heads of Terms</p> <p>The Objectors are unable to consider the Heads of Terms as to enter into them in their current format, not only means accepting the catastrophic loss of Robert Parry’s scheme but it also precludes the Objectors from being able to make representations to the Panel towards protecting Robert Parry’s scheme.</p>	<p>This is fundamentally incorrect, as Heads of Terms are not in themselves legally binding and so there is nothing to prevent parties to attempt to negotiate in good faith to try and close off the areas of concern and difference concerning objections. Simplified Heads of Terms were issued by Dalcour Maclaren on 30 October 2024 to Mr Parry’s agent and comments are awaited.</p>

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-113.21	<p>REP3-108.53 – Discussions Between the parties</p> <p>The Promoter implies that it is exploring how the two schemes can co-exist however the Objectors would refer the Panel to its response to REP3-108.41 above and also the Promoter’s current position made clear by email on 28/11/2024.</p>	<p>The Applicant reiterates that it remains keen to reach voluntary agreement with affected parties and awaits a response to its most recent communication of 28 November 2024, which was chased on 12 November 2024 and more recently (following the engagement referenced below), on the 28 November 2024.</p> <p>To clarify, the request was made to change to the arrangements of the cables and the Applicant’s response was that the project is unable make a commitment on the alignment of the cable route at this time. However, the Applicant’s land agent at Dalcour Maclarens did explain ... ‘we are keen to progress negotiations and discussions where both the Mona Offshore Wind Farm and your development proposals can co-exist’... ‘I hope that in the meantime we can come to agreement on the other terms within the voluntary agreement. The Applicant is committed to engaging constructively on the proposals and a response to the e-mail of 28 November 2024 is awaited.</p>
REP5-113.22	<p>REP3-108.54 – Restrictive Covenants and Discussions Between the parties</p> <p>The Objectors would refer the Panel to its response to RE3-108.41 and also REP3-108.53 above.</p>	<p><b>REP3-108.18</b> The landowners in this case have a total of five affected plots, comprising two over which temporary possession rights only are sought (namely plots 06-102 and 06-104) and three over which the project seeks compulsory acquisition of rights and the imposition of restrictive covenants (namely plots 06-101, 06-103 and 06-105). The powers sought are proportionate, as they are limited to rights, as opposed to full land ownership. The DCO includes the compulsory acquisition powers as a fall-back measure and on a precautionary basis, to secure all of the interests in land necessary to develop the Mona Offshore Wind Project within a reasonable timeframe. It remains the Applicant’s preference to reach voluntary agreement with affected parties, including agreeing on compensation payable and to mitigate the extent of land to be permanently acquired outright. The project team have communicated and will continue to engage on requirements and timings. Affected parties have the right to claim compensation in accordance with the statutory compensation code as regards interference with their property and interests and this applies to a number of the DCO Articles for any loss or damage caused, including the plots where temporary use will apply. Furthermore, pursuant to Schedule 9 of the DCO, existing compensation legislation is modified, so as to provide for compensation for the acquisition</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
		<p>of rights and imposition of restrictive covenants (as well as acquisition of ownership of the land).</p> <p><b>REP3-108.54</b> The Applicant can confirm that following construction, there will be restrictions on the area of the permanent easement and refers to the restrictive covenants set out in Schedule 8 of the draft Development Consent Order (PDA-003). However certain activities can still occur within this permanent easement area; for example, with the necessary consent from the Applicant it would be possible to surface the area and place on it temporary structures, or for parking vehicles. The Applicant will continue to discuss the Heads of Terms with Messrs. Parry and explore how the two schemes could co-exist.</p>