

MONA OFFSHORE WIND PROJECT

Response to Mr and Mrs Hussey ExQ2 Submission

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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MONA OFFSHORE WIND PROJECT

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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, 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 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).
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.

MONA OFFSHORE WIND PROJECT

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

MONA OFFSHORE WIND PROJECT

Units

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

1 Response to Mr and Mrs Hussey ExQ2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Mr and Mrs Hussey's response to ExQ2 below.

2 Response to Mr and Mrs Hussey ExQ2 Submission

Table 2.1: REP5-126 – Mr and Mrs Hussey

Planning Inspectorate to Ref. No	Question	ExQ2 Question	Mr and Mrs Hussey response	Applicant's response
REP5-126.1	APs IPs	<p>Dust</p> <p>In the Councils' Response to First Written Questions (ExQ1) [REP3-078] CCBC said that it is satisfied with the provision of the Outline Dust Management Plan [APP-214] as secured in the dDCO [REP4-005] and recognises that the detailed Plan would be subject to its approval as part of the discharge of Requirement 9. Therefore, it considers the measures to be acceptable at this stage in the lifecycle. If you disagree with its conclusion:</p> <ul style="list-style-type: none"> • Please explain why; and • Identify what specific changes you consider are needed to the Outline Dust Management Plan [REP2-042]. 	<p><u>Q2.1.5 DUST</u></p> <p>Following our recent meeting with the applicant (18th November 2024) it has come to our attention that there will be construction of subsoil and topsoil bunds in very close proximity to our property as part of cable corridor workings.</p> <p>The positioning of these bunds to the South East with prevailing winds often from Westerly direction will give rise to potential windblown particulate directly towards our property.</p> <p>Whilst we recognise the Outline Dust Management Plan [REP2-042] does provide some reassurance, including monitoring and possible remedial action, we would recommend the following changes be adopted for very close proximity properties and businesses so as to help avoid potential for dust creation.</p> <p>Section 1.6.2.1 States that 'Solid Screens or barriers should be erected around dust activities'</p> <p>We recommend the word 'should' be replaced by the word 'shall'</p> <p>We also recommend that for transient works like Soil Bunds that they be covered (sheeted over) once constructed so as to prevent potential for windblown particulate and therefore not requiring further specific action should high winds or periods of dry weather occur during their use.</p> <p>Further clarification would be welcomed regarding Section 1.6.5 Monitoring which references daily on-site and off- site inspections within 100mts of the boundary that includes cars, window sills etc.</p> <ul style="list-style-type: none"> • Are these inspections to be conducted as part of mobilisation hours, given that in REP4 -024 Outline Code Of Construction Practice dated 4/11/24 section 1.8.2.2 it lists site Inspections as being part of activities that would be carried out during mobilisation hours? <p>For residential receptors within 100mts of the boundary then these types of inspections could be intrusive with potential privacy issues so further detail required as to how this monitoring will be carried out.</p>	<p>The wording used to describe the measures within the Outline Dust Management Plan is taken directly from the Institute of Air Quality Management (IAQM) guidance on the assessment of dust from demolition and construction (IAQM 2023) and therefore, the Applicant will retain the wording that is currently used within the Outline Dust Management Plan (J26.2 F03). The Applicant notes that paragraph 1.6.2.1 makes the commitment that the site preparation and maintenance measures (including 'solid screens or barriers should be erected around dust activities and fully enclose where there is the high potential for the production of dust') will be adhered to throughout the construction phase.</p> <p>The soil bunds along the Onshore Cable Corridor will be covered or seeded to prevent erosion and wind whipping as per paragraph 1.11.1.1 of the Outline Soil Management Plan (J26.8 F03).</p> <p>The Applicant can confirm that inspections required outside the Order Limits will be undertaken during the core working hours. Where inspections are required on private property, the timing of these inspections will need to be agreed with the property owner.</p>
REP5-126.2	Mr & Mrs Hussey	<p>Mr & Mrs Hussey</p> <p>In the Examining Authority's Written Questions 1 (ExQ1) ([PD-013], Q1.16.3) Denbighshire County Council and Conwy County Borough Council were asked to comment on concerns you raised about noise assessment and monitoring [REP1-086] and the Applicant's response [REP2-078]. The Councils engaged with the issues in their Response to First Written Questions ([REP3-078], page 50).</p> <ul style="list-style-type: none"> • Do you agree with their position? • If not, please either explain why or cross-reference to where you consider you have dealt with the issues in previous submissions to the Examination. 	<p><u>Q2.16.1 Noise assessment and Monitoring – Councils position</u></p> <p>Councils Response [REP3-078]</p> <p>The Councils consider that the approaches taken by the Applicant to establishing baseline sound levels were appropriate and the exclusion of data measured during high winds and/or rainfall are consistent with normal practice.</p> <p>At our recent meeting (18th November 2024), the applicant finally confirmed that none of the figures for the last 2 days of the base line surveys were used and were disregarded, therefore we agree with the councils position</p> <p>Councils Response [REP3-078]</p> <p>The Councils agree that noise monitoring should be carried out during construction so that adequate control of noise and adherence to planning noise criteria can be ensured and verified, to the benefit of all parties</p> <p>We agree that noise monitoring should be carried out during construction and discussed with the applicant the potential for noise monitoring at our property should the development go ahead as proposed, so therefore we accept the councils current position.</p> <p>Councils Response [REP3-078]</p> <p>Cumulative noise impact assessment was considered and commented upon in the Councils' LIR, to which the Applicant responded appropriately [REP2-085]. The Councils are therefore of the opinion that the potential cumulative impacts on the IPs' property have been properly assessed.</p>	<p>The Applicant notes the response regarding noise monitoring during construction. The Applicant has committed to undertaking construction noise monitoring at noise sensitive receptors in the updated Outline Construction Noise and Vibration Management Plan (J26.3 F05). The specific locations and durations of noise monitoring will be determined during detailed design stage and set out in the Final Construction Noise and Vibration Management Plan, which will be submitted to the relevant local authority for agreement.</p> <p>The Applicant notes the response regarding the cumulative noise impact assessment approach. The Applicant confirms that it has applied a proportionate approach to its cumulative construction noise assessment, focussing on the closest common residential receptors to the projects considered. By doing so, the Applicant considers that the worst case cumulative impact and effect of each project has been assessed and presented in its assessment findings presented in ES Chapter 9 Noise and Vibration (APP-072) and its update submitted at Deadline 5 (REP5-010).</p>

Planning Inspectorate to Ref. No	Question	ExQ2 Question	Mr and Mrs Hussey response	Applicant's response
			<p>On this point we Disagree.</p> <p>REP2-085 appears to focus around cumulative noise impacts from traffic and we have only seen selective cumulative construction noise impacts presented as part of APP-072. Individual construction activities have been published for numbers of individual receptors but no cumulative impact assessments have been published for all close proximity receptors to the onshore substation site. Given the fact that there will be concurrent activity around the onshore substation site by the applicant itself along with additional concurrent activity in the same vicinity from National Grid, Awel y Mor etc. then we cannot agree that the potential cumulative impacts on the IP's property have been properly assessed</p> <p>We include further comment in our Deadline 5 written responses and are happy to meet with representatives of the Council if assists.</p>	
REP5-126.3	Mr & Mrs Hussey Any APs or IPs	<p>Construction Noise and Vibration Clarification Note</p> <p>Either in response to this question at Deadline 5 or at Deadline 6 when the Applicant has submitted its updated versions of the Noise and Vibration Chapter of the ES [APP-072] and the Construction noise and vibration technical report [APP-179] at Deadline 5, with reasoning for your position, please advise whether you agree with the Applicant's assumptions/ methodology, analysis and conclusions in its Construction noise and vibration clarification note [REP4-045] in respect of how those factors might affect you?</p>	<p><u>Q2.16.2 Construction Noise and Vibration Clarification Note</u></p> <p>We still believe that the full impacts of construction noise have not been fully addressed to which we provide further comment in our Deadline 5 written responses.</p>	<p>The Applicant has provided a response to the comments in its response to Mr and Mrs Hussey's Deadline 5 Submission (S_D6_44).</p>