

MONA OFFSHORE WIND PROJECT

Response to National Grid Electricity Transmission plc

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MONA OFFSHORE WIND PROJECT

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

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Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

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Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

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Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

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Units

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

1 Response to National Grid Electricity Transmission plc

1.1 Introduction

1.1.1.1 The Applicant has responded to National Grid Electricity Transmission plc's enquiry in relation to the Examination Timetable below.

2 Response to National Grid Electricity Transmission plc

Table 2.1: NGET – National Grid Electricity Transmission

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
NGET.1	<p>It is certainly NGET's intention to make a further written submission prior to Deadline 6 in order to respond to the Promoter's Response to the Examining Authority's Written Question 2.6.9 regarding Statutory Undertakers (ExQ2) (the Promoter's Response) and the accompanying set of protective provisions for the benefit of NGET submitted at Deadline 5. This submission also goes to issue 28 in the action points from ISH6.</p> <p>The reason for such submission and for enquiring about a possible appearance/hearing date is because NGET has a number of concerns about the Promoter's account of the position with NGET set out in section 1.5 of the Promoter's Response - in particular, its summary of NGET's position, negotiations to date, the outstanding issues and the adequacy of the Promoter's suggested protective provisions. NGET's written submission will address these matters in detail. However, in summary, NGET does not accept the Promoter's assertion that the Promoter's suggested protective provisions would avoid serious detriment to NGET's undertaking. A fundamental concern for NGET is the omission of safeguarding provisions in respect of NGET's future projects to extend and upgrade Bodelwyddan substation and the associated overhead lines to enable the connection of multiple projects at this location (including, indeed, the Promoter's own project). The omission of such safeguarding provisions will be to the serious detriment of not just NGET but multiple connectee projects reliant on those future upgrades.</p> <p>The first time that NGET had sight of the Promoter's Response and suggested protective provisions was after the same had been uploaded to the PINS website after Deadline 5. Up until that point, NGET had understood the Promoter's position to be as set out in NGET's written representation of 7 August 2024, i.e. that the Promoter was essentially reserving its position on the draft protective provisions that NGET first provided to the Promoter in June, pending ongoing discussions between the parties. Given those ongoing discussions and the fact that the protective provisions that NGET was seeking had recent precedent in the Awel Y Mor DCO (another</p>	<p>The Applicant has made a further update to the Draft Development Consent Order (C1 F07) at Deadline 6 in respect of the protective provisions for the protection of National Grid. For the avoidance of doubt, these provisions have not been agreed by National Grid but further align the position of the parties with respect to the drafting of those provisions. The Applicant sought at Deadline 5 and now at Deadline 6 to bring the parties' closer together. In the Applicant's experience this is an entirely normal process with regards to protective provisions discussions and was intended to demonstrate to the Examining Authority that progress was being made. The Applicant considers that good progress has been made between the parties and that progress can continue in respect of reaching an agreed position for Deadline 7.</p> <p>The Examining Authority asked specifically for the Applicant to provide its submissions in respect of sections 127 and 138 of the Planning Act 2008 in its Second Written Questions and the Applicant provided an appropriate and factual update in that regard. It was not the Applicant's intention to suggest that matters were not capable of resolution through those submissions, it was to satisfy the Examining Authority's clear requirement to have something before them in advance of the close of Examination with regards to the position on the above sections of the Planning Act 2008. The Applicant will continue to seek to reach an agreed position with National Grid.</p>

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Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	<p>connectee project at this same location), NGET had no reason to believe that these protective provisions would become contentious.</p> <p>NGET was therefore caught by surprise by the Promoter's Response and the accompanying set of protective provisions, whereby the Promoter is clearly no longer reserving its position on the protective provisions for the benefit of NGET. It is this late change of position by the Promoter to NGET's detriment that has prompted NGET to approach the Examination about possible further hearing dates.</p> <p>Whilst we take on board your comments below about timings and reasonable notice of further hearings, this request is the result of the Promoter's actions and, whilst the protective provisions are likely to be of little interest to third parties/the public, there is a fairness point that arises here in respect to NGET as a statutory undertaker who will be directly affected by the DCO project. There is also a month until the Examination closes. Notwithstanding the Christmas break, it surely would be possible to provisionally accommodate a hearing during either of the weeks commencing 6 or 13 January 2025 before the Examination closes?</p> <p>We would be grateful if you could liaise with the ExA accordingly and, if it would assist, we can provide some suggested dates during this period when the NGET team would be available to appear at the Examination.</p>	