

# MONA OFFSHORE WIND PROJECT

**Mona and Heneb: Clwyd-Powys Archaeology/ Heneb: Gwynedd Archaeology SoCG**

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Image of an offshore wind farm

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### Glossary

Term	Meaning
Archaeological and Heritage Engagement Forum – onshore	An expert working group comprising Cadw, CPAT and RCAHMW
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
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).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

### Acronyms

Acronym	Description
AHEF	Archaeological and Heritage Engagement Forum
CPAT	Clwyd-Powys Archaeology Trust
DCO	Development Consent Order
EIA	Environmental Impact Assessment
HRA	Habitat Regulation Assessment
LEMP	Landscape and Ecology Management Plan
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
RCAHMW	Royal Commission on the Ancient and Historical Monuments of Wales
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation

### Units

Unit	Description
kV	Kilovolts

# 1 INITIAL STATEMENT OF COMMON GROUND BETWEEN MONA OFFSHORE WIND PROJECT AND HENEB

## 1.1 Introduction

### 1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and Heneb – the Trust for Welsh Archaeology (hereafter referred as ‘Heneb’), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and Heneb is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 7 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination.

### 1.1.2 Mona Offshore Wind Project Elements under Heneb’s Remit

1.1.2.1 Elements of the Mona Offshore Wind Project which may affect the interests of Heneb are Work Numbers 3 to 38 landward of Mean Low Water Springs (MLWS), onshore and intertidal works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (APP-023).

1.1.2.2 This SoCG covers the following topics of relevance to Heneb:

- Surveys
- Baseline Environment
- Project Design Envelope
- Assessment of the effects from the project alone
- Assessment of the effects from the project cumulatively with other projects
- Mitigation including the Outline Written Scheme for Investigation and the Outline Landscape and Ecology Management Plan.

### 1.1.3 Overview of Mona Offshore Wind Project

1.1.3.1 Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- **Mona Array Area:** This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located

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- **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables will be located and in which the intertidal access areas are located
- **Intertidal access areas:** The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
- **Landfall:** This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
- **Mona Onshore Development Area:** The area in which the landfall, Mona Onshore Cable Corridor, Mona Onshore Substation, mitigation areas, temporary construction infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV connection to National Grid infrastructure will be located
- **Mona Onshore Substation:** This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- **Mona 400 kV Grid Connection Cable Corridor:** The corridor from the Mona Onshore Substation to the National Grid substation.

### 1.1.4 Approach to SoCG

- 1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phases of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by CPAT (now part of Heneb) within its response to Section 42 consultation and as raised through the Archaeology and Heritage Engagement Forum that has underpinned the pre-application consultation between the parties.
- 1.1.4.2 On 1 April 2024, the boundaries of the Welsh Archaeological Trusts were restructured and merged to form Heneb. The Mona Onshore Development Area is located within the following regions of Heneb:
- **Heneb-Gwynedd Archaeology:** Landfall and Onshore Cable Corridor (eastward to the county boundary with Denbighshire)
  - **Heneb–Clwyd Powys Archaeology:** Onshore Cable Corridor, Onshore Substation and 400kV Cable Corridor
- 1.1.4.3 This SoCG also includes those issues raised by both regions of Heneb during the post-application phase (i.e. relevant representations and pre-examination meetings).
- 1.1.4.4 Future consultation on areas of agreement/disagreement will be reported as in this SoCG which will apply to both regions of Heneb as an alternative to providing separate documents for each region.
- 1.1.4.5 The structure of this SoCG is as follows:
- Section 1: Introduction
  - Section 1.2: Summary of consultation
  - Section 1.4: Agreements log
  - Section **Error! Reference source not found.:** Summary.

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**1.2 Summary of SoCG**

**1.2.1 Overview**

1.2.1.1 This initial SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

**1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed**

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

**Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.**

Topic	Agreed
Surveys	All matters have been agreed
Baseline environment	All matters have been agreed
Assessment of effects from project alone	All matters have been agreed
Assessment of effects from project cumulatively with other projects	All matters have been agreed
Mitigation	All matters have been agreed

**1.3 Summary of Consultation**



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1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicant with Heneb during the post-application phase of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with Heneb during the post-application phases of the Mona Offshore Wind Project.



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**Table 1.2: Summary of pre-application consultation with CPAT (now Heneb).**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
30 November 2022	Meeting	Non-statutory engagement	<p>First meeting of the Archaeology and Heritage Engagement Forum (AHEF) to confirm the proposed approach to consultation, to discuss the scope of surveys and to provide a preview of information to be contained within the Preliminary Environmental Information Report (PEIR). Key discussion points were:</p> <ul style="list-style-type: none"> <li>• The extent of the Historic Environment onshore study area for built environment assessment and underground archaeology.</li> <li>• The desktop data sources that will be used to characterise the baseline in the PEIR.</li> <li>• Overview of the heritage intertidal survey report to be included in the PEIR and discussion of further survey work to be undertaken.</li> <li>• Overview of geophysical survey undertaken and confirmation of intention to undertake trial trenching targeting anomalies identified in the geophysical survey.</li> <li>• Discussion of the assessment of impact of installation of the cable route on Registered Parks and Gardens.</li> </ul>
12 July 2023	Meeting	Non-statutory engagement	<p>Third AHEF meeting. Key discussion points were:</p> <ul style="list-style-type: none"> <li>• Proposed approach to trial trenching</li> <li>• Discussion of the scope of the heritage intertidal survey that had been completed in October 2022.</li> </ul>
12 July 2023	Email	Non-statutory engagement	<p>Agreement that post-consent trenching may be necessary if access for pre-consent trenching proves to be impossible for various reasons including access and weather.</p> <p>Agreement to the trenching layout presented with recommendation of 2 additional trenches.</p> <p>Guidance on the scope of the WSI and monitoring requirements.</p>
01 June 2023	Section 42 Statutory Consultation Response	Statutory engagement	<p>Confirmation that the assessment structure and content is proportionate to the predicted impacts and is progressing as agreed in the scope and WSI's. Confirmation that provision for more detailed intertidal survey has been agreed. Comment that the impact on buried archaeology is clearly unknown yet pending further assessment results and it is too early to state the environmental impacts, mitigation and monitoring here with any precision but that it agreed with the provisional impacts stated for above ground archaeology and impacts to the character of the historic landscape and this is mirrored for the predicted cumulative impacts. Agreement to the Next Steps.</p>
14 November 2023	Meeting	Non-statutory engagement	<p>Fourth AHEF meeting. Key discussion points were:</p> <ul style="list-style-type: none"> <li>• Summary of trial trenching campaign achieved to date and difficulties encountered</li> <li>• Proposed approach for completing and reporting of the remaining survey campaign</li> </ul>

**Table 1.3: Summary of post-application consultation with Heneb.**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
9 April 2024	Relevant Representation	Statutory engagement	Heneb confirmed that it is the organisation that covers the onshore aspects of the project from an archaeological point of view and that it has been involved with the process as Clwyd-Powys Archaeological Trust up until the merger. Heneb confirmed that it will make recommendations on the proposed onshore route and structures, liaising with the onsite contractors.
5 May 2024	Relevant Representation	Statutory engagement	<p>Heneb-Gwynedd Archaeology confirmed that it was not in a position to provide informed comments on the scheme or the submitted documents but that it was satisfied that regular detailed discussions have been ongoing with Heneb-Clwyd-Powys Archaeology and that consultees have been satisfied with the approach taken to date. The opportunity to provide a detailed representation at a later date was requested.</p> <p>Heneb-Gwynedd Archaeology confirmed that representation would be provided on the following matters:</p> <ul style="list-style-type: none"> <li>• the scope and adequacy of archaeological assessment and evaluation</li> <li>• the assessment of impacts presented in the Environmental Statement</li> <li>• the suitability of proposed further investigation, mitigation and/or enhancement measures, including the draft Outline Onshore Written Scheme of Investigations</li> <li>• the suggested wording for proposed conditions or other means of securing such works</li> <li>• the content of the Outline Landscape and Ecology Management Plan, Outline Code of Construction Practice and other scheme documents as they pertain to archaeology.</li> </ul> <p>Heneb-Gwynedd Archaeology requested an update on the progress of the trial trenching programme.</p>
17 May 2024	Meeting	Non-statutory engagement	<p>Meeting of the AHEF- onshore to summarise the DCO application with regards to historic environment, and the next stages of the DCO process. Key discussion points are:</p> <ul style="list-style-type: none"> <li>• Key elements of the project description as included in the application</li> <li>• Overview of the surveys (including scope and results) undertaken for the Environmental Statement</li> <li>• Impacts assessed in the Environmental Statement</li> <li>• Milestones of the DCO process</li> <li>• Next steps (including completion of the trial trenching survey, Relevant Representations and Statements of Common Ground</li> </ul>

## 1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

**Table 1.4: Position definitions and colour coding.**

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed but not material	The matter is not considered to be agreed between the parties, but is not deemed material
Not agreed	The matter is not considered to be agreed between the parties.

1.4.1.2 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

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**Table 1.5: Agreement Log between the parties on onshore archaeology.**

Reference Number	Discussion point	Applicant's Position	Heneb's Position	Status
<b>EIA</b>				
HENEB.OA1	Consultation	The Application documents have had regard to matters raised by CPAT/Heneb via statutory and non-statutory consultation activities in relation to the historic environment.	Heneb agree that the Application documents have regard to matters raised by CPAT/Heneb via statutory and non-statutory consultation activities in relation to the historic environment. Source: Email 25 July 2024 (Clwyd-Powys) and email 26 July 2024 (Gwynedd)	Agreed
HENEB.OA.2	Surveys	The site-specific survey undertaken to aid in the characterisation of the onshore archaeology baseline environment have been collected to a specification that fulfils the requirements of archaeological assessment as defined in Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects (Wessex Archaeology, 2021).	Heneb are satisfied that the site-specific surveys have been undertaken to the specification identified in the WSIs. Source: Meeting 2 July 2024	Agreed
HENEB.OA.3	Surveys	The site is outside of a Registered Historic Landscape and therefore an ASIDOHL2 assessment is not required.	Heneb are in agreement that an ASIDOHL2 assessment is not required. Source: Meeting 2 July 2024	Agreed
HENEB.OA.4	Surveys	Post-consent trenching may be necessary if access for pre-consent trenching proves to be impossible for access and weather reasons.	Heneb agree that post-consent trenching may be required but note the Applicant's intended ongoing trenching programme. Source: Meeting 2 July 2024	Agreed
HENEB.OA.5	Baseline environment	Sufficient primary and secondary data (including site-specific surveys) have been collated to appropriately characterise the onshore archaeology baseline environment for the purposes of EIA within Volume 3, Chapter 5: Historic environment (APP-068).	Heneb note that the evidence base is not complete with the on-going trenching programme, however Heneb are satisfied that the archaeology baseline is robust for the EIA purposes. Source: Meeting 2 July 2024	Agreed

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Reference Number	Discussion point	Applicant's Position	Heneb's Position	Status
HENEBOA.6	Assessment Methodology	The sensitivity and significance of the onshore archaeology receptors has been appropriately and adequately described within Volume 3, Chapter 5: Historic environment (APP-068).	Heneb are satisfied that the archaeology receptors have been adequately described in terms of sensitivity and significance. Source: Meeting 2 July 2024	Agreed
HENEBOA.7	Assessment Methodology	The methodologies used in within Volume 3, Chapter 5: Historic environment (APP-068) are appropriate for assessing the potential impacts of Mona Offshore Wind Project on onshore archaeology.	Heneb are in agreement that the methodologies for assessing the potential impacts are appropriate. Source: Meeting 2 July 2024	Agreed
HENEBOA.8	Project design envelope	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.	Heneb are satisfied that the Mona Offshore Wind Project has appropriately defined and used the MDS in the assessment of impacts on archaeology receptors. Source: Meeting 2 July 2024	Agreed
HENEBOA.9	Assessment of the effects from the project alone	The potential impacts identified within Volume 3, Chapter 5: Historic environment (APP-068) represent a comprehensive list of the potential impacts in relation to onshore archaeology.	Heneb are satisfied with the impacts assessed in the EIA but note that if new evidence is encountered during the remaining trial trenching survey, this would be managed through the mitigation protocol identified. Source: Meeting 2 July 2024	Agreed
HENEBOA.10	Assessment of the effects from the project alone	The likely significant adverse residual effects (in EIA terms) identified within Volume 3, Chapter 5: Historic environment (APP-068) represent a comprehensive list of the likely significant adverse residual effects on onshore archaeology.	Heneb agree that, the list of significant adverse residual effects in Volume 3, Chapter 5: Historic environment (APP-068) is comprehensive and that no other significant adverse residual effects are predicted. Source: Meeting 2 July 2024	Agreed

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Reference Number	Discussion point	Applicant's Position	Heneb's Position	Status
HENEBOA.11	Assessment of the effects from the project cumulatively with other projects	The likely significant adverse residual effects (in EIA terms) which are predicted to arise from the development of Mona Offshore Wind Project cumulatively with other project and plans identified within Volume 3, Chapter 5: Historic environment (APP-068) represent a comprehensive list of the likely significant adverse residual effects on the historic environment.	Heneb agree that the list of significant adverse cumulative effects Volume 3, Chapter 5: Historic environment (APP-068) is comprehensive and that no other significant cumulative adverse effects are predicted. Source: Meeting 2 July 2024	Agreed
HENEBOA.12	Mitigation	The mitigation measures identified in Volume 3, Chapter 5: Historic environment (APP-068) are considered appropriate and adequate for Mona Offshore Wind Farm.	Heneb agree that the mitigation measures (set out in the Mitigation and Monitoring Schedule (APP-196)), are appropriate for the EIA and note that the Outline Onshore WSI (APP-209) will be updated with the results of remaining trial trenching survey. Source: Meeting 2 July 2024	Agreed
<b>Other Documents and Plans</b>				
HENEBOA.13	Outline Onshore Written Scheme of Investigation (WSI)	The Outline Onshore WSI (APP-209) is secured under Requirement 11 of the draft DCO and is considered appropriate with regard to proposed monitoring and management principles.	Heneb agreed in a meeting on 2 July 2024 that the Outline Onshore WSI (APP-209) is appropriate in regard to monitoring and management. The Outline Onshore WSI (APP-209) has been updated with the results of remaining trial trenching survey and sets out the archaeological mitigation strategy In emails dated 11 and 18 December, Heneb agreed that the updated Outline Onshore WSI (J23 F03) is appropriate.	Agreed

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Reference Number	Discussion point	Applicant's Position	Heneb's Position	Status
HENEBOA.14	Outline Landscape and Ecology Management Plan (LEMP)	The Outline LEMP (APP-208) is secured under Requirement 12 of the DCO and is considered appropriate with regard to proposed monitoring and management principles.	<p>Following the meeting on 2 July, Heneb confirmed their agreement with the proposed management and monitoring principles in the Outline LEMP (APP-208). Heneb commented that the proposed screening planting and hedgerow reinstatement were appropriate; that the hedgerow planting provided a degree of landscape character gain and the new woodland planting reflects a formerly greater extent of woodland in this area.</p> <p>Source: Emails 3 and 5 July 2024</p>	Agreed



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Reference Number	Discussion point	Applicant's Position	Heneb's Position	Status
HENEBOA.15	Outline Code of Construction Practice (CoCP)	The Outline CoCP (APP-212) is expected to be secured under the DCO and is considered appropriate with regard to proposed monitoring and management principles.	<p>Following the meeting on 2 July, Heneb reviewed the CoCP (APP-212) confirmed their agreement with the proposed monitoring and management principles providing that the text is added to paragraph 1.10 of the CoCP setting out the following points:</p> <ul style="list-style-type: none"> <li>• An archaeological team will be present on-site completing the post consent mitigation. Areas may be cordoned off while the fieldwork takes place; these areas will be avoided by all other contractors until the fieldwork element of the mitigation is completed. Toolbox talks will be provided to contractors on the protocol for reporting unexpected discoveries to the archaeological clerk of works and the site manager.</li> <li>• Prior to commencing the archaeological mitigation, pre-construction surveys will be undertaken in accordance the Outline Landscape and Ecology Management Plan (LEMP) (APP-208). Soil stripping, handling and restoration in areas of archaeological mitigation will be accordance with the measures set out in the Outline Soil Management Plan (APP-220). On completion of construction of the Mona Offshore Wind Project, landscape planting and habitat creation will be undertaken in accordance with the Outline LEMP (APP-208).</li> </ul> <p>Source: Emails 3 and 5 July 2024</p>	Agreed

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