

MONA OFFSHORE WIND PROJECT

Response to Cefn Meiriadog Community Council D6 Submission

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Image of an offshore wind farm

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

Units

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

1 Response to Cefn Meiriadog Community Council D6 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Cefn Meiriadog Community Council's Deadline 6 submission below.

2 Response to Cefn Meiriadog Community Council D6 Submission

Table 2.1: REP6-133 Cefn Meiriadog Community Council

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-133.1	<p>Use of minor road under Change 1a 1(a).</p> <p>Notwithstanding Denbighshire County Council's withdrawal of its objection to the Applicant's Change 1a request (published 17 December), Cefn Meiriadog Community Council (CMCC) remains strongly opposed to the use of the minor road from Glascoed Road to the changed access as sought under Change 1a. Having stated in its previous submissions that the characteristics of the road in terms of lack of passing places and their nature, and 90-degree bends, taken in relation to the length and weight of vehicle-trailer combinations proposed make it unsuitable for the proposed use, it questions whether an on-site assessment has been carried out rather than a purely desk-based assessment. CMCC also feels compelled to point out again the hazards presented by egress on to Glascoed Road by vehicle-trailer combinations of the type proposed, and questions whether this has been properly and fully assessed.</p>	<p>An assessment of road safety has been undertaken and is presented in Appendix 1 to Annex 1 of the Change Request Report (CR1-030). The Applicant's assessment has been informed by site visits and professional judgement as well as desk based assessment. Desk based assessment is necessary as part of the traffic modelling undertaken using computer software, as shown on Figure 4 of Appendix 1 of Annex 1 of the Change Request Report (CR1-030).</p> <p>Following feedback received as part of the Change Request consultation (see the Change Request Consultation report (CR1-043) and Change Request Consultation Feedback Response (REP6-080)) additional mitigation specific mitigation measures relating to the minor roads junction with Glascoed Road have been included in the Outline Construction Traffic Management Plan (REP6-060) to ensure highway safety is not compromised as a result of its use as part of the change request proposal. The Applicant is confident that use of this road will not compromise highways safety and the local highway authority agrees with that position (see CR1-046).</p>
REP6-133.2	<p>1(b).CMCC has strong concerns that use of this road by Mona will set a precedent, and that in due course National Grid and IGP will seek to use it for their respective developments, citing Mona's permitted use of it in support of their own proposals to use it.</p>	<p>Development proposals are considered on their own merit with regards to their traffic impact. The traffic generated by different development proposals are bespoke to each in terms of quantum, classification / vehicle type, intensity, duration and timing and their traffic impacts are consequently bespoke to each. Any other development proposal will be considered on its own merits and its traffic impacts considered accordingly as part of any future planning application.</p>
REP6-133.3	<p>IGP Battery Storage Facility</p> <p>CMCC finds the Applicant's reluctance to engage with the ExA's question (ExQ2, Q2.0.2) regarding the proposed IGP BESS development understandable but profoundly regrettable nevertheless. As CMCC showed in its own</p>	<p>The Applicant notes that an EIA Scoping request was submitted to Denbighshire County Council on 23 December 2024 (planning application reference number 40/2024/1575/EIA-SCO) the Applicant has reviewed this information and has provided an updated Cumulative Effects Assessment at Deadline 7 (S_D7_5).</p>

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	<p>submission, IGP have provided a fairly detailed timetable, albeit indicative and highly subject to change, suggesting a clear and unavoidable overlap in its and Mona's proposed construction phases. IGP have also provided a plan showing the extreme closeness of its proposed BESS development both to the Applicant's onshore substation and to National Grid's proposed substation extension.</p>	
<p>REP6-133.4</p>	<p>Mobilisation hours</p> <p>CMCC noted with concern the distinct lack of clarity in the Applicant's responses at ISH6 to questions concerning the precise nature, range and location of activities proposed to take place during the mobilisation times preceding and following daily core construction hours, in particular as regards the nature and volume of noise likely to be produced from 6am, but also in relation to use of artificial lightning during the hours of darkness. Taking into account both the cable corridor and the substation site, but also the work compounds, haul roads, etc, associated with construction, this is of critical importance to a significant number of residents living within earshot of the various sites.</p>	<p>The Applicant has revised the wording of Requirement 14 within the draft DCO (REP6-016) (Draft DCO) in response to concerns raised at ISH6 to remove reference to 'unloading' as part of mobilisation activities and has made specific reference that excluded heavy good vehicles from deliveries. In addition, noise limits for the mobilisation hours have been added to the Outline Noise and Vibration Management Plan (REP6-040) to address the concerns raised.</p>
<p>REP6-133.5</p>	<p>'The Old Lane' bridleway</p> <p>In response to ExQ2 Q2.12.6 concerning the Applicant's Outline Public Rights of Way Management Strategy in respect of Plot 10-187, i.e. in relation to the 'Old Lane' and its pending designation by DCC as a Public Right of Way, the Applicant states he will "consult DCC regarding the timeframes for when The Old Lane will be added to the definitive map and will agree appropriate management measures for the route (if required)." CMCC believes that the nature of the bridleway is such that its use should be strictly avoided and alternative access/egress identified, but that if such management measures are applied they should be limited to pedestrian and occasional quad bike or similar usage in order for it not to be irreparably damaged.</p>	<p>During the operational phase, it will be necessary for the Applicant to access its cable corridor at various points along that length. The Applicant has sought to identify the best options for taking this access bearing in mind existing accesses that may be utilised (as opposed to constructing new ones which would have environmental and other consequences). As such the Applicant identified this access as necessary and appropriate for the development and has included it in the Application. Visits to this access will be infrequent and will be made by personnel in a 4x4 or on foot.</p> <p>Should the access be designated a bridleway in the future, under the Road Traffic Act (1988) the Applicant would still be permitted to use to access as proposed in the Applicant with the consent of the landowner. The Applicant is in correspondence with the neighbouring landowners regarding the rights sought at this location through which any owner / occupier considerations can be realised.</p>