Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Rebecca Face D6 Submission

Deadline: 7

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Image of an offshore wind farm

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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,

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.

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).

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 Rebecca Face D6 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Rebecca Face's Deadline 6 submission below.

2 Response to Rebecca Face D6 Submission

Table 2.1: REP6-150 Rebecca Face

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-150.1	My primary concern is that the river emanating from two springs, that border the B5381 between land plot 06-097 and 06-100, will be permanently and completely stopped, resulting in the total destruction of the 3 acre wetland in the valley below. Damage to these springs will also result in irreparable damage to the complex eco system that lives in this wetland and the wider area, and the death of several protected species. It will also result in irreparable damage to the trees and habitats that support all the wildlife that transit through this important and rare green corridor. The guaranteed damage to these springs will likely also cause severe flooding in the land plot 06-100 and associated road flooding, and extreme ice risk in winter.	The proposed construction activities in the vicinity of the land parcels 06-097 and 06-100 will not result in the permanent cessation of, or damage to, the spring, based on the geological and hydrogeological information contained within the Geology, Hydrogeology and Ground Conditions chapter of the Environmental Statement (F3.1 F02), and the wetland habitat referred to in your response will not be significantly affected. The Applicant notes there are no designated groundwater dependant ecosystems in the vicinity of the land parcels and 06-097 and 06-100. Access was not granted for ecological surveys on land parcel 06-097. Construction activities will be managed through the Code of Construction Practice (CoCP) and the Landscape and Ecology Management Plan (LEMP), which will minimise any potential impacts to habitats and protected species. The implementation of the CoCP and LEMP are secured in Requirements 9 and 12 (respectively) of the DCO. The Outline CoCP (J26 F06) and Outline LEMP (J22 F05) have been submitted into the examination.
REP6-150.2	Secondly there is a further spring in the field of land plot 06-097, that will be moved (if not stopped entirely) by these underground works. This will potentially cause the entirety of the agricultural plot to become agriculturally (and therefore commercially) unviable in perpetuity. There is also an important issue regarding loss of access to this land, and loss of pasture, which will force the permanent closure of the farming business.	The Applicant notes the presence of small springs at shallow depth in the vicinity of land parcel 06-097 and the B5381, however the exact location of the spring (as referenced in REP6-150.2) is not identified on Ordnance Survey mapping and access to land parcel 06-097 was not granted. During detailed design, the location of the spring will be confirmed. Where appropriate, a hydrogeological risk assessment will be undertaken and the trenchless crossing will be designed to minimise impacts to the spring, as committed to in the outline Construction Surface Water and Drainage Management Plan (REP6-046). The method statement for crossings will be provided in the final Onshore Construction Method Statement (which forms part of the CoCP) and will be approved by the relevant planning authority. The Agricultural Liaison Officer (ALO) will be responsible for liaising with landowners to ensure water supplies for livestock either remain in place or alternatives are provided during construction, the provisions for an ALO are set out in the Outline Code of Construction Practice (J26 F06).

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REP6-150.3	Thirdly there is significant practicality, and environmental issues regarding the proposed location of the gateway access for TCC2. It is important to note here that all of the problems outlined above, would not exist if the applicant's written application simply matched the verbal descriptions of what they intend to do.	Preliminary access designs (including the location of the access for TCC2) are included in the outline Highways Access Management Plan (REP6-062). The access and the swept path analysis associated with the practicality of the access is included in Figure JNY11256-14 of Appendix D of REP6-062. These preliminary access designs will be refined as part of the detailed design process associated with discharge of Requirement 10 of the draft Development Consent Order (REP6-016) in consultation with the relevant highway authority. Environmental issues regarding potential hedgerow removal associated with the preliminary access design for TCC2 are assessed within the Onshore Ecology chapter (APP-066). Other potential impacts to onshore ecology (including designated habitats and species) are assessed with the chapter and no significant impacts are identified at this particular location. The information regarding the access at TCC2 is explained within the Application and the project envelope is clearly defined.
REP6-150.4	The applicant's verbal description is as follows. During the on-site visit of the EXA to the area of TCC2, the two representatives of the applicant stood in the bus stop at the junction of the B5381 and the A548, behind the minibus and told the EXA the following FACTS: !st rep "The gateway for TCC2 is going over there on the A548." Pointing towards the A548 at the north end of TCC2. 2nd rep "no its not, it's going right here" and he pointed to the hedge on the south side of TCC2, opposite the bus stop. 2nd rep continued" and the cable is going through here, north to south, and continuing down to TCC3, over there." As he indicated the line of cable with his arm running north to south, crossing the B5381 at the eastern most side of the cable corridor alongside the A548. If the applicant's written application stated either of those gateway options, and stated that the cable would run directly from plot 05-093, crossing the B5381 and entering plot 06-100; then I would whole heartedly support this project. However, at this time the application does not state any such thing, and in its current state constitutes an ecological disaster.	
REP6-150.5	My primary concern are the two springs that form the river head on either side of the B5381. There is one spring on each side of the road. The spring on the south side (on the	The Applicant notes that an 'issue' is identified at the property in land parcel 06-908 on the north side of the B5381 (see Land Plan (Onshore (B5 F04)) and considers this 'issue' represents one of the spring flows referred to in REP6-150.5. Local mapping indicates that the

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	verge beside plot 06-100) is at the end of the flood plain ditch that prevents the 2 springs flooding into plot 06- 100 when both springs are in full flow, (see picture 1). The flood plain also ensures that the river and wetland are not deprived of water. This hydrological system is stable and safe. It does not dry out and does not flood the road. The surface water, once ejected from the underground fractures, is then channelled through pipes under the road to the outlet at the boundary between plot 06-097 and the small house on the west side. The surface water then flows between the house land's boundary and the ancient woodland, (see picture 1). The water flows along the riverbed until it runs across the flat wetland on the base of the valley between the two steep valley sides of ancient woodland (see picture 2).	westerly flowing watercourse at that location will receive water from the springs, runoff principally from plot 06-100 and potentially highway runoff from the bridged crossing of the B5381. Given the local topography, the source area for the groundwater discharged at the springs is likely to extend to the southeast beneath plot 06-100, towards the high ground in that direction. The Applicant accepts that the closure of groundwater bearing fractures can result in the redirection of groundwater flow along permeable flow if they exist. The determination of fracture pathways is also difficult; however, the presence and significance of shallow fracturing can be determined using narrow diameter vertical boreholes and risk evaluated. A hydrogeological risk assessment will be undertaken and the trenchless crossing will be designed to minimise impacts to any springs, as committed to in the outline Construction Surface Water and Drainage Management Plan (REP6-046). The Applicant considers it unlikely that drilling or shallow trenching could result in the drying up of the springs at their current location.
REP6-150.6	The problem with the application is that they want to drill holes through the fractuous bed rock that the springs rise through, (see picture 2 for the cable route stated in the application and the cable route stated verbally). Any digging or drilling in this area will guarantee the movement of these springs. As with all springs, there is no underground mapping for the fractures that the water is travelling through. The applicant cannot avoid the fractures as they do not know where they are. They are unavoidable. Any disturbance of the ground in proximity to these springs will cause the crumbly fractures to shift and alter the pressures. The water will change track, it is unavoidable, uncontrollable and once it has moved it is irreparable. Any attempt to "repair" the damage or move it in a specific direction will simply result in further movement and damage.	
REP6-150.7	Springs of this pressure have the potential to move miles when disturbed, will the DCO force the applicant to	

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	mitigate this damage by building a pumping station at the new site of the spring and pump the huge volume of water back to the current outlet so that the river can continue to flow, and keep that equipment pumping in perpetuity? (I will take this moment to point out that in perpetuity means forever, but I will limit this problem to a more manageable time span, the remaining life span of our sun, which is 4.5 billion years approx. I won't bore you with the math of what that mitigation would actually cost in build, maintenance and fuel to run the pumping station. I will simply point out that the cost would be vastly prohibitive.)	
REP6-150.8	This is an uncontrollable movement of a river. The applicant has already stated that the council has refused them permission to move the controllable surface water of another river. The Exa and the council really must refuse the uncontrollable and unpredictable movement of this one.	The Applicant disagrees that its construction activities will lead to the uncontrollable movement of a river.
REP6-150.9	The application acknowledges that ground water in this area rises through fractures in the bedrock, ie springs. The application does not acknowledge that these two springs, flood plain ditch, river or wetland even exist.	The Applicant notes the spring features exist in the vicinity of land parcel 06-097 and their location will be confirmed during detailed design. The Applicant has identified surface watercourse and flood zones in Volume 7, Annex 2.2: Surface watercourses and NRW Flood Zones (APP-118) and PDA-018 which confirms the location of the ordinary watercourses and areas of flood risk associated with surface water and small watercourses. However, that Applicant notes that there are no flood plains or designated wetland habitats.
REP6-150.10	The stopping up or drying of this river, due to the springs moving away, will obviously cause the complete drying up of the wetland below. Wetlands are protected habitat. When the wetland is drained the entire eco-system will die. All the plants and animals within this environment are specially adapted to extreme wet conditions and cannot survive being dry. This includes the long stand of trees that grow along side the flood plain next to the B5381, labelled G42 on the tree surveys and the trees labelled T87 (which grows directly over one of the springs) and	The ordinary watercourse described in response REP6-150.10 is shown in Volume 7, Annex 2.2: Surface watercourses and NRW Flood Zones (APP-118) and PDA-018. It extends thought an area of woodland located away from the Onshore Cable Corridor. The woodland is not designated as Ancient Woodland and the area of flood risk associated with the ordinary watercourse is not a designated wetland. The watercourse receives water from multiple sources including groundwater from the springs, surface water tributaries and surface water runoff from adjacent land and therefore, is unlikely to be affected by the construction activities of the Mona Offshore Wind Project.

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	T88 (which grows close to the river outlet) and T86 who's root spread also taps into the spring.	
REP6-150.11	There is also a significant risk to road safety in winter from the movement of the water flow. If the water moves to 06-100 it will then flow out of the gateway and onto the B5381, away from the a548 and into the valley. This section of road is extremely steep and national speed limit. The risk from sheet ice (which this area experiences regularly in winter, this is a high elevation area) on this section of road is a very high risk of death to humans.	Surface water runoff and groundwater will be managed in accordance with the Construction Surface Water and Drainage Management Plan (REP6-046), which forms part of the CoCP. Measures will be implemented to avoid surface water accumulating on the B5381 as a result of the construction activities.
REP6-150.12	I quote Mona's application document- environmental statement F3.2 hydrology and flood risk page 9 of 82- "the secretary of state must refuse development consent where a project is likely to cause deterioration of a water body or it's failure to achieve good status or good potential"	The Applicant has assessed the potential of the Mona Offshore Wind Project to cause deterioration of a water body or its failure to achieve good status or good potential (see Volume 7, Annex 2.4: Water Framework Directive surface water and groundwater assessment (APP-120). The assessment concludes that for all water bodies in the Onshore Order Limits the Mona Offshore Wind Project will not prevent the achievement of Water Framework Directive objectives.
REP6-150.13	This problem, and the following problems, can all be resolved by simply narrowing the corridor to keep all the cable trenches within 100m of the A548. This will give the applicant the max work area that they say they need and will give the springs the max possible buffer to prevent damage.	The land rights sought over plot 06-097 are proportionate as set out in the statement of reasons (REP6-020). The land is required for the installation of the cables through either trenched or trenchless techniques. The Applicant believes that the measures implemented through the various management plans secured under Requirement 9 of the DCO (including the commitments within the outline Construction Surface Water and Drainage Management Plan (REP6-046)) are appropriate to prevent any potential damage to the springs referred to.
REP6-150.14	During my discussions with the applicant, the only reason they have ever given me for the extra width that they're asking for at this location, is that they want to avoid a "hard bend". The angles of turn between TCC2 and TCC3 are 29 degrees and 55.5 degrees (see picture 3). This is a very gentle sweeping curve which will not be altered by reducing the width of the corridor. This is in comparison to a 96.5 degree bend followed by a 68 degree bend on works plan onshore sheet 10, (see picture 4) and an 100	

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	degree bend on sheet 7, where the corridor appears to be at its minimum width of 74 m, (see picture 5).	
REP6-150.15	My second concern is the spring within the field, (see picture 1). The problems is essentially the same as for the road springs, any ground disturbance will move the spring. It's location is the roads edge. It would only need to move a few inches and it will no longer flow across the field it would flow down the road or into the field across the road, leaving this land parcel with no water for either livestock or horticulture, which will force the closure of the farming business.	The Applicant refers to its response to REP6-150.15.
REP6-150.16	The gateway and unnamed road that it turns off are also severely affected during construction. The application states the land will be fenced off and the road closed. The applicant does not seem to be aware of the law, livestock must be fed, watered and checked every day. It is not possible for any farmer to simply close the gate and walk away for four years + until they decide that they've finished their project.	No public highways will be closed to facilitate the construction of the project. Where required, suitable traffic management measures will be put in place in the relevant locations to ensure continued access (see the Outline Highways Access Management Plan (REP6-062)). While fencing will be in place for the duration of the construction period, for safety and security reasons, gated access points will be provided to allow for landowners to cross the Onshore Cable Corridor as described in the Outline Construction Fencing Plan (REP6-044).
REP6-150.17	The third biggest concern is the access gateway into TCC2. The simple fact of this issue is that the applicants cable delivery truck will NOT fit through the gate. The specification of this truck is an astonishing 28.816 meters long by 4.5 meters wide, (see picture 6). The gateway is 61 meters down the road, past a choke point, with an 85 cm high verge on the opposite side. To facilitate this truck getting through this gateway would require the complete removal of the verge and trees on the opposite side, or the expansion of the bell mouth to such an extent that there will be no safe separation from the A548, and the removal of 30+ meters of bat feeding hedge. The drawings and descriptions in the application are hopelessly inaccurate.	A preliminary access design layout for TCC2 is shown at Appendix D of the Outline Highways Access Management Plan (OHAMP) (J26.16 F03) and has been designed in accordance with highway design standards to allow for all construction vehicles to safely turn through it. Swept path analyses are contained therein of HGVs turning through TCC2 such that both arriving and departing HGVs can do so simultaneously and the geometries of TCC2 are such to enable these movements safely. Such geometries for TCC2 allows for the movement of cable drum vehicles to also turn both in and out of the access. Knowledge and professional judgement on vehicle turning requirements defined this, however, to demonstrate the ability of the cable drum vehicle to arrive and depart through TCC2, a swept path analysis is attached at Annex 1. This demonstrates the ability of the cable drum vehicle to satisfactorily arrive and depart between the A548 Penrefail Crossroads and TCC2. It shows that the cable drum vehicle would do so without any overrun of the verges (the cable drum vehicle would remain within

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	In summary, the 100m of land that the applicant needs is available and suitable next to the A548 and should result in a successful project. Whereas the land that the applicant wants, desires and has described in their heads of terms as land for the applicants "enjoyment" will cause irreparable ecological and economical damage.	the extents of the carriageway), there are no 'choke points', there is no requirement for any removal of verge, hedgerow or trees as a result of the cable drum vehicle and there is no requirement for any expansion of the bellmouth to enable the cable drum vehicle to turn through it. The preliminary access design layout for TCC2 as shown at Appendix D of the OHAMP (J26.16 F03) has been designed in accordance with highway design standards to allow for all construction vehicles (including the cable drum vehicle) to safely turn through it. The drawings and descriptions of TCC2 have followed highway design standards and industry best practice. The OHAMP (J26.16 F03) sets out how the preliminary designs for the site accesses (including TCC2) will progress to detailed design and those detailed designs approved by Conwy County Borough Council. Conwy County Borough Council has confirmed the appropriateness of the OHAMP (J26.16 F03) (which contains the preliminary design layout of TCC2) and with the approval process for the site accesses, as set out in the Statement of Common Ground between the Applicant and Conwy County Borough Council (S_D3_23 F04).
REP6-150.18	The rights that the applicant are seeking are entirely disproportionate to the verbal description of what they need to do at 06-097. They say they only need access for one person to walk across one time, on one day to guide the trenchless cable underground. So I have to ask why they feel the need to place any restrictions on plot 06-097 at all, let alone full cable rights?	The land rights sought over plot 06-097 are proportionate as set out in the statement of reasons (REP6-020). The land is required for the installation of the cables through either trenched or trenchless techniques. The restrictions proposed on the plot are to ensure the protection of the cable and any ancillary apparatus during the projects lifetime, without these restrictions there would be a risk to the operation and maintenance of the project.
REP6-150.19	When the applicant was asked about funding for the project at one of the hearings, the applicant basically answered that BP would be paying. My concern with this is that, to my knowledge, there is no law that can force a third party to pay Mona's bills for them, even a majority shareholder. Therefore unless BP supplies in writing that they agree to that and accept full financial responsibility and liability for the entire project and all associated cost arising, including court costs, compensation etc etc, then the Secretary of state must refuse permission as Mona	The Funding Statement (REP6-018), submitted as part of the Applicant, demonstrates that the development of the Mona Offshore Wind Project will be adequately funded and therefore that funding is no impediment to the delivery of the Mona Offshore Wind Project.

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	has clearly stated that they do not have the money to cover the project.	
REP6-150.20	Due to the heavy-handed nature of the proposal, I have serious doubts as to whether it will have any positive effect on reducing co2 emissions. Draining a wetland will release thousands of tons of co2. Then take the haul road-levelling a mountain so they can put it through a crusher, transport it in hundreds of trucks to a processing plant, transport again to site, spread it out as a road, cut down a forest to make fence posts to protect the road, fire up a steel plant to make the fence wire to go on the posts…….i can go on but I won't. when you stack all those emissions against the tiny lifespan estimated to be 35 years. I really don't believe the project would stand up to scrutiny on the co2 issue.	The Applicant confirms that the construction activities will not lead to the draining of a wetland. The Applicant has undertaken a Climate Change assessment (Volume 4, Chapter 2: Climate Change (F4.2 F02)) which considers the effect of greenhouse gas emissions from all phases of the Mona Offshore Wind Project. This includes emissions from land use changes and from the manufacturing and installation of the Project infrastructure during construction. The assessment concludes that the Mona Offshore Wind Project would achieve carbon payback from the end of the 12th year of its operation.
REP6-150.21	The surveying for the project is entirely inadequate, by there own paperwork the two trees at 06- 097 are likely bat roosts, and yet no bat monitoring was done in the area, they also missed the purpose-built bat roost in the area that the council holds the key for.	The scope of the ecology surveys has been agreed as adequate by Natural Resources Wales, as reflected in their respective SoCG (S_D1_13 F03). The initial Ground Level Roost Assessments (GLRA) reported in the bat roost survey technical report [APP-129, APP-130 and APP-131] identified two trees along the track between plots 06-097 and 05-093 close to the crossroads as having 'moderate' bat roost potential. These are shown on Figure 1.6 in part 1 of the bat roost survey technical report (APP-129). As committed to in Table 1.1 (pre-construction surveys) of the outline Landscape and Ecology Management Plan (OLEMP) (J22 F05), further surveys of these trees (along with any other trees on the route identified as having low or higher suitability for bat roosts) will be undertaken prior to the commencement of construction to inform any requirements for mitigation. This may include obtaining a European Protected Species Mitigation (EPSM) licence from Natural England where impacts (damage or disturbance) to trees confirmed as supporting bat roosts cannot be avoided.
REP6-150.22	There was no adequate consultation prior to the application. I only became aware of the project 2 days before the deadline for the first response of AP's to the	The Applicant undertook non-statutory consultation between 7 June – 3 August 2022 when searching for areas for the offshore transmission infrastructure and onshore cable routes, and this was followed by further targeted non-statutory consultation 26 September – 7 November

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	EXA. I had looked at all posted notices, but the only land pictured and mentioned was 06-100. I am also very restricted in my ability to take part in the exa process as I have no internet signal or connection, so I apologise if I am talking about things that have already been dealt with, but I have no ability to download updated documents.	2022 focusing on potential locations for the onshore substation. Finally, a third statutory consultation was undertaken 19 April to 4 June 2023. Details of these consultations, the events, materials and advertisements can be found within the Consultation Report and supporting appendices (APP-037, 038, 039, 040). While materials were hosted on the Applicant's project website, advertisements were placed in the local newspapers and deposit locations were identified for anyone with internet issues. At all times a project email and telephone number has been available and any contact requesting support in accessing documents or information would have been complied with. For example, to facilitate Ms face's attendance and involvement at the examination hearings a room was specifically set up for use at Venue Cymru. In addition, Ms Face has not been identified as having a legal interest in the land through the Applicant's His Majesties Land Registry searches, and the landowner has not responded to our contact and confirmed this is the case or sent back the Landowner Questionnaire or Land Interest Questionnaire. Hence Ms Face has not been consulted as a section 44 interest during consultation.
REP6-150.23	I do not seem to be on the compensation list and neither is the owner of plot 06-097, as far as I can see.	Ms Face has not been identified as having a legal interest in the land through the Applicant's His Majesties Land Registry searches and therefore would not be identified explicitly within the Book of Reference (REP6-022).The interests listed as Category 1 in the Book of Reference (REP6-022) against plot 06-097 has been identified from the HM Land Registry. Dalcour Maclaren on behalf of the Applicant also issued land interest questionnaires to confirm that the details obtained were correct, the Applicant has continued to undertake data refreshes to ensure the information included within the book of references are correct. However, for the avoidance of doubt, not being listed within the book of reference does not preclude an interest from making a relevant compensation claim that can be evidenced and the Applicant will review any compensation claim submitted in accordance with the Compensation code when a statutory obligation arises.