

# MONA OFFSHORE WIND PROJECT

## Response to Stuart Neil D6 Submission

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Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

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## MONA OFFSHORE WIND PROJECT

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## MONA OFFSHORE WIND PROJECT

### Glossary

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

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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).

## MONA OFFSHORE WIND PROJECT

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

## MONA OFFSHORE WIND PROJECT

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### Units

Unit	Description
GW	Gigawatt
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles



# **1 Response to Stuart Neil D6 Submission**

## **1.1 Introduction**

1.1.1.1 The Applicant has responded to Stuart Neil's deadline 6 responses below.

## 2 Response to Stuart Neil D6 Submission

Table 2.1: REP6-152 Stuart Neil

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-152.1	For consideration by the EXA. As an affected party my objections to the DCO in relation to my plot 06-097 at LAND PLAN-ONSHORE, SHEET NUMBER 6, in its current format remain.	
REP6-152.2	The applicant is requesting to take 9710m <sup>2</sup> of my only livestock grazing land, this is currently 26100m <sup>2</sup> . If allowed to go ahead and compulsory acquisition of 06-097 is granted, this will result in a complete loss of 37% in land, in livestock feed and any agricultural commercial viability in 06-097 essentially sterilising the land. The total loss of all my prior investment into the land. This represents approximately 16% of my total land.	<p>In relation to plot 06-097 the Applicant would be in temporary possession of the plot during construction. As set out in Article 29 of the draft DCO, following the completion of construction, any land only temporarily possessed would need to be restored to the reasonable satisfaction of the landowner and handed back to them within 12 months of completion of the relevant work. The location of the permanent easement strip and associated rights within the Mona Onshore Cable Corridor has not yet been determined. Its location will be determined once the cables are installed and construction is complete, the Applicant will only secure the permanent rights over the land necessary for the protection of the assets installed.</p> <p>The Applicant welcomes dialogue with Mr Neil to better understand the farming practice on the land and identify mitigation measures to minimise disruption to the farm holding on plot 06-097. The provisions for mitigation measures are described in the Outline Code of Construction Practice (CoCP) (J22 F06). The Outline CoCP is secured by Requirement 9 of the draft DCO (C1 F08). A final version of the CoCP will be implemented as approved by the relevant local planning authority.</p> <p>Any loss of livestock feed will be compensated for in the normal way in accordance with the Compensation Code meaning the provision of the Land Compensation Act 1961, the Compulsory Purchase Act 1965 and the Land Compensation Act 1973 together with any other statutory provisions and body of case law relevant to the assessment of compensation, with the ability for advance compensation claims to be made to ensure farming operations can continue.</p>

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-152.3	<p>The plot 06-097 includes my only access gateway and track that enables me to enter and exit my entire property with feed trailers, livestock trailers. This is due to the topography of the land that I own. The requested section 06-097 being Compulsory rights acquisitioned, is the only flat section I have on my entire holding. This will leave me in the impossible position of not being able to enter or exit my own property with anything I am unable to carry by hand, to bring in winter feed or take livestock to market or purchase new livestock, or bring in anything on a trailer, or take delivery's. The track alone requires periodic maintenance due to the wetland nature of the ground in parts along 06-097 this is also not allowed under the Heads of terms.</p>	<p>The Applicant has committed to use trenchless techniques to cross the minor road being referenced, as detailed in the Onshore Crossing Schedule (Mapping ID 76, REP5-012). This will ensure that access along this road and access to properties always remains open. Furthermore, it should be noted as indicated within the Street Works and Access to Works Plan (REP6-013), that access to the onshore cable corridor and associated temporary construction compound in this location will be taken from AC-G1 (plot 05-093) and not through plot 06-097.</p> <p>As outlined in the Outline CoCP (J22 F06), secured through Requirement 9 of the draft DCO (C1 F08), an Agricultural Liaison Officer will be appointed prior to the commencement of onshore site preparation works and will be the principal contact for ongoing engagement about practical matters with landowners including crossing points and access provisions onto the land to ensure the continued access to the land for farming matters including those that the affected party has highlighted.</p>
REP6-152.4	<p>My livestock rely solely on spring water as their drinking water, the risk to these springs within 06-097 and close by to my land, due to the proposed underground cable drilling would be catastrophic. This is due to the delicate nature of the natural springs in and around my land. This will result in the total loss of ability to keep livestock at my property, keeping livestock would be impossible after all my years of investment, reducing the land's agricultural value to zero.</p>	<p>Potential impacts to groundwater will be managed through the Outline Construction Surface Water and Drainage Management Plan (REP6-046). The Outline Construction Surface Water and Drainage Management Plan forms part of the CoCP and is therefore secured by Requirement 9 of the draft DCO (C1 F08). A final version of the Construction Surface Water and Drainage Management Plan will be implemented as approved by the relevant local planning authority.</p> <p>Paragraph 1.6.2.2 Outline Construction Surface Water and Drainage Management Plan (REP6-046) of the explains that measures to manage risks to groundwater supply sources will be developed in accordance with the hierarchy set out in section 1.10.4 of the Outline Code of Construction Practice (CoCP) (REP6-034). Where appropriate, hydrogeological risk assessments will be undertaken for groundwater supply sources to demonstrate the level of risk and to confirm the appropriate mitigation.</p> <p>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</p>

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
		<p>ALO are set out in the Outline Code of Construction Practice (REP6-034).</p>
<p>REP6-152.5</p>	<p>Whilst I have no planning application under consideration at present it is my intention to build my forever home, as <b>[redacted]</b> requiring a purpose-built home especially as I age at plot 06-097. This is due to it being the only flat piece of land on my entire property and is also ideal due to its proximity to existing infrastructure along the B5381. It has fantastic views across to my ancient woodland which provides excellent habitat and wildlife corridor for, many bird species including Owls and raptor roosts, bats, foxes, badger sets and further views on out to the coast. Having invested all my life savings, time and effort into my land, the stress and negative effect this DCO application is having on me is considerable.</p>	<p>The restrictions placed on the land will be limited to the area required for the protection of the buried cables and are therefore both necessary and justified in order to ensure the installed apparatus can be safely operated and maintained. The anticipated easement width over which permanent rights will be sought is 30 m, however where there are complex crossings, this may be wider, as set out above, the Applicant can only secure the permanent rights over the land necessary for the protection of the assets installed.</p> <p>These submissions are the first time that the possibility of development on this plot has been raised to the Applicant, and the Applicant welcomes dialogue with Mr Neil on this matter to better understand the proposals for the land and so that impacts can be mitigated where practicable.</p> <p>The Mona Offshore Wind Project will have no impact to the Ancient Woodland in proximity to land parcel 06-097 as it is not included within the Order Limits and there will otherwise be no impacts.</p>
<p>REP6-152.6</p>	<p>I object and cannot agree that 06-097 will be required for the project to proceed, merely desired by the applicant. The cable corridor as indicated at (LAND PLAN-ONSHORE, sheet 6) that leads to my property starts at 75m wide at plot 05-091. Then at plot 05-093 it expands to 100m, then 220m in part and reduces to a 115m minimum width as it reaches the B5381 at Pen yr fail crossroad. All within plot 05-093.</p>	<p>The Order Limits at this location widen to accommodate a temporary construction compound and to accommodate the trenchless techniques to be used to cross the B5381 (and potentially also the A548). The length and alignment of the trenchless technique will be determined during detailed design, post-consent and the Applicant will only take rights in respect of the land it requires. At this current stage, it is not possible to determine exactly where the works will need to be undertaken so flexibility is retained in order to ensure the development can be delivered at this location. This approach is consistent with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018).</p>
<p>REP6-152.7</p>	<p>The inclusion of my land 06-097 is wholly unjustifiable and I say it cannot be considered required, to expand the corridor to nearly 240m width along the B5381 for the project to proceed.</p>	
<p>REP6-152.8</p>	<p>The applicant stated in RR-078.5 the corridor width may be up to 100m for the trench-less crossing of the B5381. Also, at document D3 page 6 of 73, 1.3.2.17 it states up to a 100m corridor width. The applicant already has a 115m corridor width at plot 05-093 adjacent to my property (heads of terms agreed).</p>	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-152.9	The applicant is intending further down the route to cross two roads at LAND PLAN-ONSHORE, sheet 7, 06-108, 07-111, 07-120 all at a 100m corridor width. Also, near the end of the cable route at LAND PLAN-ONSHORE, sheet 10, 10-179, 10-180, 10-183. With a 90 degree turn and road crossing, this is all completed within the max 100m corridor width. An expansion to a 240m corridor by the extra inclusion of plot 06-097 is wholly unjustified.	The crossings highlighted are both of small unnamed roads and are therefore considered less complex from an engineering perspective than the potential crossing of the Penrefail Crossroads near parcel 06-097, which could include the crossing of both the A548 and B5381. These are therefore not comparable to the crossings noted as additional space is also required at the crossing of the Penrefail Crossroads to accommodate temporary construction compounds, as shown on Figure 3.19 of the Project Description (F1.3 F02).
REP6-152.10	The applicants own Engineer stated the thermal loads/losses due to trench-less buried cables would be minimal at this location as it is only approximately 4000m from the cable start point at the coast. The geology is not an obstacle to the drilling operation, as it is just a case of changing the cutting tool to suit the ground, it has the ability to cut through solid rock. Both adjacent plots at 05-093 and 06-100 have already had bore hole and surveying completed, with apparently with no problems being shown.	Boreholes have been completed at the trenchless technique crossings to inform the trenchless technique crossing locations and to inform the detailed design process for the cable design post-consent. Thermal factors influenced by the depth of the trenchless technique profile and the ground geology will be considered and accommodated during the detailed design stage, post-consent.
REP6-152.11	In the plans presented by the applicant it shows, the applicants intention in using my land, to cross under two roads, Natural springs and Mature trees crossing the Unnamed road and the B5381 at 06-097. Rather than staying within plot 05-093 to cross the B5381, it clearly makes no sense to justify the extra use of my land, as a need to reduce any thermal issues or making a tight turn.	As stated above (REP6-152.6), the Applicant requires flexibility in this location, as the final route of the trenchless technique crossings will not be determined until the detailed design stage, post-consent. The Applicant has considered human rights in respect of the compulsory acquisition powers sought under the Draft DCO (C1 F08) and has set out further detail of this in the Statement of Reasons (D3 F04) at section 1.12
REP6-152.12	Considering the applicant is already requesting 05-093 which is 115m at its minimum and only requiring one crossing of the B5381. Allowing a minor modification to the scheme at this point, I request must be considered. And My rights under Article 1 of the first protocol to the European Convention on Human Rights have been impacted.	which address any implications for Article 1 of the European Convention on Human Rights. Further information on this was also provided by the Applicant in response to REP6-081.
REP6-152.13	My grave concern is the applicant has only requested Compulsory Acquisition of rights for my property for other purposes than presented, due to the massive expansion of the cable corridor to include my land, rather than actually requiring it. I say the applicant has not demonstrated satisfactorily that the intended Compulsory acquisition is necessary and proportionate under the planning act 2008.	The Applicant confirms the application has been promoted in compliance with statutory requirements and the applicable DCLG Planning Act 2008 Guidance and a compelling case in the public interest exists to justify the powers sought as set out in the Statement of Reasons (D3 F04). The powers sought are necessary and proportionate for the development to be delivered, operated and maintained. As explained at the

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
		<p>Compulsory Acquisition Hearing 1 (paragraph 13, REP4-033), by seeking temporary possession powers over the whole Order Land, with permanent rights to be acquired over the as-built project, the Applicant's approach is to ensure that the land and rights in land to be acquired are no more than is reasonably required for the purposes of the project.</p> <p>The extent of the land within plot 06-097 is considered essential for the installation of the onshore export cable in this location as set out in REP6-152.6 above.</p>
REP6-152.14	<p>Despite my concerns I have only ever received the same heads of terms to sign from the applicant, this is something that I cannot and will not do.</p>	<p>The Applicant has attempted to contact Mr Neil via letter numerous times throughout the pre-application and examination stages of the application. During this time, no comments or correspondence has been received from Mr Neil on the heads of terms to secure the rights sought voluntarily. Without comments from Mr Neil or an understanding on the concerns within the terms, the Applicant is not clear on what amendments to the voluntary terms are being requested. The Applicant welcomes communication from Mr Neil on the heads of terms outside of the examination forum in hope to agree a voluntary agreement for the rights being sought.</p>