

MONA OFFSHORE WIND PROJECT

Response to Cefn Meiriadog Community Council Deadline 4 submission – Comments on Proposed Change Request

Deadline: 5

Application Reference: EN010137

Document Reference: S_D5_3

Document Number: MOCNS-J3303-JVW-10474

3 December 2024

F01



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

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

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

Acronyms

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

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Units

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

1 RESPONSE TO CEFN MEIRIADOG COMMUNITY COUNCIL DEADLINE 4 SUBMISSION – COMMENTS ON PROPOSED CHANGE REQUEST

1.1 Introduction

- 1.1.1.1 The Applicant has responded to Cefn Meiriadog's comments on the proposed change request below.

2 Response to Cefn Meiriadog Community Council D4 Submission - Change Request

Table 2.1: REP4-093 - Cefn Meiriadog Community Council

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-093.1	Cefn Meiriadog Community Council (CMCC) notes the Applicant's Notification of Intention to Submit a Change Request Application dated 29 October 2024 (Document Reference: S_CR_1/Document Number: MOCNS-J3303-JVW-10404). ('The Notification').	<p>The Applicant can confirm that access to Change 1a would be located along the unnamed road between Glascoed Road and the existing track.</p> <p>Road safety analysis has been undertaken of the road between Glascoed Road and the Change 1a. That analysis concludes that there are no current road safety issues along the road or at its junction with Glascoed Road. Further information is available in Appendix 1 to Annex 1 of the Change Request Report (S_CR_2 F02).</p>
REP4-093.2	The Community Council expresses its serious concern over the change described in the Notification as 'Change 1a': i.e. Order Limits change to include an existing access track to the west of the onshore substation for temporary construction access during onshore site preparation works and construction of the onshore substation and surrounding works.	
REP4-093.3	CMCC's concern is based on the assumption that from Glascoed Road the access track referred to will be itself be accessed via the minor road to the south of Glascoed Road and immediately to the west of the western edge of St Asaph Business Park.	
REP4-093.4	If this assumption is correct, the Council objects strongly to this proposed change. If the assumption is incorrect, and the access track would be reached by other means, then the objection does not apply.	
REP4-093.5	Even by the standards of Cefn Meiriadog's minor roads, beyond the property Waen Meredydd (situated on the first bend after leaving Glascoed Road), the road concerned presents particular difficulties for those using it. It is narrow with only one passing place; it has four right-angle bends between its starting point and the access track referred to; it has high hedges; and it has a significant gradient over a	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	portion between two of the right-angle bends. In normal conditions visibility is poor due to the bends and high hedges, while in icy conditions the bends and gradient represent significant hazards. There is poor visibility at the junction with Glascoed Road, making access to Glascoed Road from the minor road difficult and somewhat hazardous.	
REP4-093.6	Notwithstanding the difficulties it presents, the road is used by numbers of Cefn Meiriadog residents as the shortest and quickest access to Glascoed Road and St Asaph.	
REP4-093.7	The Notification states that "use of this existing access track and associated land is necessary to facilitate onshore site preparation works and for those works to be delivered in a timely manner, in particular time-critical surveys to inform the detailed design of key elements of the onshore substation platform, land reprofiling for landscaping, and temporary and permanent access routes to be delivered from the Glascoed Road as well as other onshore site preparation works...".	The Change Request Report (S_CR_2 F02) has been updated to provide clarification on Change 1a. The Applicant can confirm that the access will only be used during the onshore site preparation works period. These onshore site preparation works include archaeological investigations, investigations for the purpose of assessing ground conditions (to establish the detailed design of the finished ground level and onshore substation platform), ecological surveys and site clearance (surveys and tree and vegetation removal).
REP4-093.8	From its long familiarity with the road and the residents using it, CMCC strongly believes that the use described is inappropriate, in particular the implication (e.g. "land reprofiling for landscaping") that it will be used by large vehicles.	The Outline Construction Traffic Management Plan has been updated to accompany the Change Request (S_CR_15). This document confirms that "Only light vehicles, vans, 4x4 vehicles with trailers associated with the onshore site preparation works will be permitted to use access AC-T1 shown on the Change Request: Street Works and Access to Works Plan (Change 1a). No HGVs will be permitted to use Change Request Access AC-T1." In addition, the following commitments are made:
REP4-093.9	It is also noted that the Notification states that the access track will be used not just for site preparation but during construction also, implying that the minor road could if necessary be used during the construction phase, even if the principal access to the access track for the construction phase has by that time been constructed elsewhere.	<ul style="list-style-type: none"> On completion of the temporary construction access road from Glascoed Road to the Onshore Substation, vehicles will cease to use Change Request Access AC-T1 following notification to Denbighshire County Council. No construction vehicles will be permitted to access the Onshore Substation site through Change Request Access AC-T1.
REP4-093.10	The Council believes therefore that, if its assumption is correct and the minor road in question will be used for access, it will be a completely inappropriate use of a public road and will impact negatively on the community. It disagrees strongly with the Applicant's assertion in the	

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	Notification that "...none of Changes 1 – 5 will result in any new or different likely significant environmental effects. Overall, therefore the Applicant does not consider that the proposed changes would result in a materially new or materially different impacts and they are capable of being accepted as an in-Examination change to the Application".	
REP4-093.11	It is to be regretted that the Applicant did not feel able to give a preliminary indication of the proposed changes to the Inspectors at the time of the Accompanied Site Inspections on 15 October. While CMCC is unaware which route was actually taken, the most direct route from the penultimate site inspection (NG connection point) to the final one (Mr & Ms Hussey's residence) is along precisely this minor road, giving the Inspectors an opportunity to be actively aware of the nature of the road in relation to the proposed Change 1a in the notification. Taken as a whole the proposed changes in the Notification seem to represent a considerable amount of preparatory work and one would assume that the proposed changes' conception and development work were already in progress by the time of the Accompanied Site Inspections.	The Applicant submitted details of the proposed changes into the examination at the earliest possible point.
REP4-093.additional text 1	MH: know if you have seen latest document (Attached)from Mona in that they want to use the track by the national grid pylon connection compound for access during onshore substation site prep and construction. They also want to make a few other changes to access from Glascoed road but the use of the track by connection compound concerns me In order to get to this track then they will (presumably) use the existing road from Glascoed road up past Waen Meredydd and along which whilst this has been used for survey people/vehicles etc it is not suitable for daily use and heavy equipment which they will undoubtedly need since they are talking of activities like land reprofiling, they say that	The Applicant assumes these notes have been included in error and has not provided a response.

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Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	<p>they will also use the access track during construction and not just site prep.</p> <p>Whilst full detail is not included it is unacceptable in my view so welcome any thoughts on suitability from Council view point, also if they get this then its also likely in my view that NG amongst others would also start to look at this access route</p>	
REP4-093. additional text 2	<p>MH: Think more info will be out tomorrow but my initial comment is disappointment that no mention when we visited the site the other week, cant believe they werent aware then which would have given opportunity for examiners to see full picture- it feels like some wool has been pulled over everyone eyes.</p> <p>Notification of Intention to Submit a Change Request</p> <p>Application of 29/10/2024</p> <p>and none of Changes 1 – 5 will result in any new or different likely significant environmental effects. Overall, therefore the Applicant does not consider that the proposed changes would result in a materially new or materially different impacts and they are capable of being accepted as an inExamination change to the Application</p>	
REP4-093. additional text 3	<p>Issue Specific Hearing 3 (ISH3): Environmental Matters Hearing Action Points</p> <p>With reference to NPS EN-1 para 4.3.19, is it possible that even if considered acceptable in their own right with mitigation measures in place, the various effects arising as a result of the onshore substation could add up to have a significant effect on the community or the environment either as a result of the project alone or cumulatively with other proposed developments?</p>	
REP4-093. additional text 4	<p>4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole,</p>	

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	even though they may be acceptable when considered on an individual basis with mitigation measures in place.	