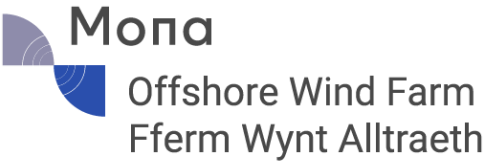


Mona Offshore Wind Farm
Fferm Wynt Alltraeth

Security classification: Public



RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Latest revision						
Reason for issue	Author	Date	Checker	Date	Approver	Date
Submission to the Secretary of State	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025

This document is copyright and shall not be reproduced without the permission of Mona Offshore Wind Limited	Document number		Revision code
	MOCNS-J3303-JVW-10583		F01

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Document revision history

Revision code	Reason for issue	Author	Date	Checked	Date	Approved	Date
F01	Submission to the Secretary of State	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025	Mona Offshore Wind Limited	12.06.2025

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Contents

1	RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025).....	1
1.1	Introduction	1
1.2	Defence Infrastructure Organisation.....	2
1.3	Ørsted Interested Parties.....	3
1.4	Welsh Government	7
1.5	Natural Resources Wales	8

Tables

Table 1.1:	Comments on the Defence Infrastructure Organisation's (DIO's) response to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)	2
Table 1.2:	Comments on the Ørsted Interested Parties' (IPs) response to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)	3
Table 1.3:	Comments on the Welsh Government's responses to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025).....	7
Table 1.4:	Comments on the Natural Resources Wales's responses to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)	8

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.

Acronyms

Acronym	Description
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
DIO	Defence Infrastructure Organisation
IP	Interested Party
SoS	Secretary of State
UK	United Kingdom

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1 RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1.1 Introduction

1.1.1.1 On 29 May 2025, the Secretary of State published a letter (the SoS's letter) inviting all interested parties (IPs), including the Applicant (Mona Offshore Wind Limited), to comment on the information provided in response to his information request on 12 May 2025 (Consultation 1). The Applicant's response to the SoS's letter is provided in this document and includes comments on the following IP's submissions:

- Defence Infrastructure Organisation (Section 1.2)
- Ørsted IPs (Section 1.3)
- Welsh Government (Section 1.4)
- Natural Resources Wales (Section 1.5)

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1.2 Defence Infrastructure Organisation

Table 1.1: Comments on the Defence Infrastructure Organisation's (DIO's) response to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)

Secretary of State Ref. No.	IP's response	Applicant's comment
Paragraph 15	Thank you for your letter dated 12th May 2025 within which you have requested information in relation to the above project. Request number 15 is directed at the Defence Infrastructure Organisation (DIO), inviting comments on Requirement 23 – Warton Aerodrome Primary Surveillance Radar.	Noted.
	The applicant included Requirement 23 within their draft Development Consent Order however the wording has not been agreed by DIO. The applicant has submitted a proposal to mitigate the effects of the development upon the Warton Aerodrome Primary Surveillance Radar (submitted 24th February 2025). This proposal is currently being assessed by BAE Systems Ltd. The objection to this development must remain in place until the technical and operational assessments on the mitigation proposal have been completed and concludes that the proposal is viable.	Noted. The Applicant understands that the mitigation proposal has been technically assessed by BAE Systems, but the operational assessment is yet to be completed. The Applicant has requested an update from BAE Systems on the status of the assessments of the mitigation proposal.
	DIO cannot agree to the Requirement until the outcome of the mitigation assessment is known, however, in the meantime DIO is willing to consider draft Requirement wording. The applicant has submitted alternative Requirement 23 wording. This wording is currently being considered by DIO and BAE Systems Ltd. Updates to PINS and the applicant will be provided in due course. I trust this is clear however should you have any questions please do not hesitate to contact me.	The Applicant, DIO and BAE Systems are meeting to discuss the requirement drafting on 13 June 2025 and will provide an update on the outcome of this meeting in the Applicant's response submission due 23 June 2025.

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1.3 Ørsted Interested Parties

Table 1.2: Comments on the Ørsted Interested Parties' (IPs) response to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)

Secretary of State Ref. No.	IP's response	Applicant's comment
Paragraph 6	<p>1. Introduction</p> <p>1.1 We represent six operational offshore windfarms in the East Irish Sea (as set out relevant representations RR-004, RR-007, RR-047, RR-087, RR-088 and RR-090), who we refer to together as the "Ørsted IPs". The Ørsted IPs are interested parties to the application by Mona Offshore Wind Farm Limited (the "Applicant") for an Order under the Planning Act 2008 (the "Act") granting Development Consent for the Mona Offshore Wind Farm (the "Project").</p> <p>1.2 This document contains a response to the Secretary of State for Energy Security and Net Zero's ("SoS") request for further information ("RFI") dated 12 May 2025, on behalf of the Ørsted IPs.</p> <p>1.3 At paragraph 6 of the RFI, the Ørsted IPs are invited to provide views on the Applicant's submission "Technical Note Calculation of Net Effects on GHG Emissions" ("GHG Note") ([AS033]), accepted by the examining authority on 10 January 2025. The GHG note was provided following examination deadline 6 on 20 December 2024, and three working days before the final examination deadline.</p> <p>1.4 The Ørsted IPs provided their initial views on the GHG note at deadline 7 in their response to deadline 6 submissions [REP7-153]. The Ørsted IPs maintain the issues raised in that submission, however, given the limited time the Ørsted IPs had to consider the GHG Note, they appreciate the opportunity to expand on some of these issues.</p>	Noted.

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Secretary of State Ref. No.	IP's response	Applicant's comment
	<p>2. Response to GHG Note</p> <p>2.1 As explained in their deadline 7 submissions [REP7-153], the Ørsted IPs do not consider the GHG Note provides an accurate assessment of the worst-case scenario of the effects of the Project, in terms of GHG emissions. The GHG Note assesses the effects of the Project on the basis of the shortest possible lifetime of each of the Ørsted IPs assets.</p> <p>2.2 In other words, the GHG Note ignores the potential for the Ørsted IPs' assets to continue operating beyond their initially anticipated lifetimes. It has been explained throughout this examination, and in the examinations of the Morgan Offshore Windfarm Generation Assets ("Morgan")¹ and Morecambe Offshore Windfarm Generations Assets ("Morecambe")² (together, the "MoMo assets"), that the Ørsted IPs' assets are capable of continuing to operate beyond their initially anticipated lifetimes, both from a consenting and engineering perspective.</p> <p>2.3 Detailed evidence on this point was submitted in the examination for Morecambe. In response to an action point arising out of a hearing in that examination, the Ørsted IPs provided a detailed note outlining the consenting position in respect of the assets. In summary, there is no requirement for the assets to be decommissioned at a particular date. None of the core operational consents for the Ørsted IPs' assets are subject to an expiry date. Further, none of the marine licences (largely held for construction/maintenance purposes) require the decommissioning of the assets at a particular date.</p> <p>2.4 The note also addressed the integrity of the assets from an engineering perspective. Based on extensive industry experience, and technical assessments of its assets, it is considered the Ørsted IPs' wind farms in the vicinity of the Project could be operated beyond their initially anticipated lifetimes. This submission is provided as Appendix 1.</p> <p>2.5 As outlined in the Ørsted IPs deadline 7 submission, the wake effects of the Project, and in particular the cumulative wake effects with Morgan and Morecambe are likely to impact decision making regarding the ongoing operation of the Ørsted IPs' assets.</p> <p>2.6 Further evidence on this matter was submitted in response to questions by the examining authority in the Morecambe examination. The Ørsted IPs provided modelling of the financial consequences of the predicted wake losses for their assets ("Financial Modelling"). The</p>	<p>In response to ExQ2.19.5 (REP5-080), and further expanded on in REP6-082, the Applicant set out the uncertainty inherent in the assessment of future greenhouse gas emissions within the Greenhouse Gas Assessment (APP-182). That uncertainty of future scenarios stems from the necessary prediction of the UK long-run marginal emissions factor of future generation. Any assessment of the impact of a given scheme, such as the Mona Offshore Wind Project, must be understood on the basis that at any point in time renewable generation from other generator sources may be more, or less, than the long-run marginal emissions factor published by DESNZ and used in the assessment as the future baseline.</p> <p>It is therefore the case that when considering the Greenhouse Gas Assessment (APP-182), and the significance of effects of the Mona Offshore Wind Farm, the precise timings of the decommissioning of individual assets, such as those of the Ørsted IPs, is not relevant to the assessment. The Greenhouse Gas Assessment considers the national picture of future generation, where avoided emissions from specific projects would be replaced by increasingly renewably sourced generation as we approach 2030 and on to 2050.</p> <p>The scenarios outlined by the Ørsted IPs of either a shorter, or longer, operational lifetime for their projects than those considered in the Technical Note: Calculation of the Net Effects on Greenhouse Gas Emissions (AS-033) therefore do not negate the principle findings of the Greenhouse Gas Assessment (APP-182) or the Technical Note: Calculation of the Net Effects on Greenhouse Gas Emissions (AS-033) that the presence of Mona Offshore Wind Project will have a significant net lifetime benefit for avoided greenhouse gas emissions.</p>

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Secretary of State Ref. No.	IP's response	Applicant's comment
	<p>Financial Modelling includes the consequences of cumulative wake effects of the Project and Morgan. The Financial Modelling indicated that the impacts of the predicted wake effects could be sufficient to result in the ongoing operation of the assets becoming unviable. This risk becomes relevant as the assets become fully merchant.</p> <p>2.7 The Financial Modelling has been provided to the Secretary of State via letter dated 2 May 2025. For completeness, the Financial Modelling is provided as Appendix 2 to this response.</p> <p>2.8 To ensure the SoS has consistent information before it, the Ørsted IPs have also prepared tables showing the project-alone financial impacts from the Project and Morgan which are provided at Appendix 3. These are equivalent to table 12 in the Financial Modelling and were also provided with the 2 May letter to the SoS.</p> <p>2.9 The evidence outlined above and attached to this letter clearly demonstrates that there is a strong possibility the wake effects of the Project along with the MoMo assets could result in the decommissioning of the Ørsted IPs assets earlier than would otherwise have been required.</p> <p>2.10 In light of the clear evidence submitted in this examination, and which is in the public domain via other examinations, the GHG Note should have assessed the scenario in which the Ørsted IPs' assets are decommissioned earlier than would otherwise have been possible (i.e. a loss of an additional 10 year operating period for each of the assets), as a result of wake effects of the Project alone and cumulatively with the MoMo assets. This would provide a realistic worst-case scenario against which the benefits of the Project could be assessed.</p> <p>2.11 It is irrational for the Applicant to proceed with its GHG assessment on the basis that the assets would be decommissioned at the earliest possible opportunity. Such an approach fails to properly assess the environmental baseline and its likely evolution as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>2.12 The Applicant cannot draw conclusions regarding the significance of the effect of the Project on climate change without having properly assessed a worst-case scenario. The Ørsted IPs suggest the Applicant be requested to provide and updated GHG assessment which incorporates</p>	<p>The Applicant is aware that a large number of factors influence a wind farm operator's decision on the timing of decommissioning a project, including technical, regulatory, and financial, and that an operators view on the likely lifetime of the project may change through the operational period of the project. The Applicant notes the points made by the Ørsted IPs in <i>APPENDIX 1- Submission regarding consenting position</i>. However, the Applicant took a realistic view on when the Ørsted IPs' projects may decommission in order to provide an assessment demonstrating the net greenhouse gas impacts when considering Mona and the potential loss of avoided emissions from the Ørsted IPs' projects, and the counterproductive effect of spatial or layout mitigations used to try and address that loss of avoided emissions. Undertaking that assessment using different dates will not alter the overarching conclusion of the assessment, that Mona Offshore Wind Farm will have a net benefit. The assessment also considers a 35-year operational lifetime of Mona Offshore Wind Farm, but any extension of Mona Offshore Wind Farms operational lifetime, following the same logic as applied to the Ørsted IP projects life extension, would result in additional net avoided emissions, and reinforce rather than alter the conclusions of the assessment.</p> <p>The Applicant also notes the inclusion of financial modelling and project specific tables in Appendix 2 and 3 of the Ørsted IPs' response. The Applicant notes the Ørsted IPs statement that the information is a mix of publicly available data and information provided through the respective Morecambe Offshore Windfarm Generation Assets, Morgan Offshore Wind Project Generation Assets, and Mona Offshore Wind Project's Development Consent Order (DCO) examinations. The Applicant has no comments on the</p>

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

Secretary of State Ref. No.	IP's response	Applicant's comment
	<p>this scenario, so that the SoS can properly evaluate the project in accordance with the relevant legislative and policy framework.</p>	<p>financial information provided by the Ørsted IPs in Appendix 2, but would reiterate points made previously [see REP6-130] that the wake modelling on which the impacts of projects presented in Appendix 3 are based are not validated for the situation it is being used to assess, and utilises project information not in the public domain, so cannot be validated or refuted by the Applicant or other parties, and should be viewed in that context by decision makers.</p> <p>The Applicant also notes, at paragraph 2.8.233, that the recently published consultation draft of NPS EN3 sets out (emphasis added):</p> <p><i>However, there is no expectation that wake effects can be wholly removed between developments, or that inter-project compensation arrangements are a necessary means to mitigate the impact of wake effects, although developers may opt to take such approaches outside of the planning process.</i></p>

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1.4 Welsh Government

Table 1.3: Comments on the Welsh Government's responses to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)

Planning Inspectorate Ref. No.	IP's response	Applicant's comment
Paragraph 13	<p>Section 135 consent for woodland plots 02-034 and 02-036</p> <p>The Welsh Ministers hold a leasehold interest in plots 02-034 and 02-036, and these are managed by Natural Resources Wales (NRW) on the Welsh Ministers' behalf. The Applicant and NRW continue to have constructive discussions about the legal and practical arrangements of the occupier's consent in connection with the cable crossing these plots.</p> <p>NRW anticipates that final agreement is imminent, and the Welsh Minister will then be in a position to provide the s.135 consent promptly. The parties do not currently see there is any impediment to reaching an agreed position and that section 135 consent will be forthcoming in relation to these plots as soon as possible.</p>	<p>Noted.</p> <p>The Applicant will provide a fuller response by 23 June 2025 in response to the Secretary of State's request for information (Consultation 3) dated 30 May 2025.</p>
Paragraph 16	<p>Proposed Designation of New National Park</p> <p>Following the inclusion of a commitment in our Programme for Government for 2021-26, the Welsh Government has asked NRW, as our statutory advisers on Designated Landscapes, to take forward a programme of work to consider designating a new National Park based on the Clwydian Range & Dee Valley National Landscape.</p> <p>Following a period of engagement in 2023, and a public consultation on a Candidate Area in 2024, NRW are working towards a statutory consultation on a Designation Order in the Autumn of 2025. The outcome of this consultation will inform a final decision by NRW on the making of the Order and submission to Welsh Ministers, together with supporting documentation, for consideration by Welsh Ministers.</p> <p>It is anticipated that any Designation Order would be sent to the Welsh Ministers by the end of 2025.</p> <p>At this stage it is unknown if there will be a need for Welsh Ministers to consider the need to call a public inquiry prior to determining whether to confirm, amend or refuse to confirm the Order.</p>	<p>Noted.</p>

RESPONSE TO SECRETARY OF STATE CONSULTATION 2 (LETTER DATED 29 MAY 2025)

1.5 Natural Resources Wales

Table 1.4: Comments on the Natural Resources Wales's responses to the Secretary of State Consultation 1 (SoS's letter dated 12 May 2025)

Planning Inspectorate Ref. No.	IP's response	Applicant's comment
Paragraph 13	<p>Section 135 consent for woodland plots 02-034 and 02-036</p> <p>The Welsh Ministers hold a leasehold interest in plots 02-034 and 02-036, and these are managed by Natural Resources Wales (NRW) on the Welsh Ministers' behalf. The Applicant and NRW continue to have constructive discussions about the legal and practical arrangements of the occupier's consent in connection with the cable crossing these plots.</p> <p>NRW anticipates that final agreement is imminent, and the Welsh Minister will then be in a position to provide the s.135 consent promptly. The parties do not currently see there is any impediment to reaching an agreed position and that section 135 consent will be forthcoming in relation to these plots as soon as possible.</p>	<p>Noted.</p> <p>The Applicant will provide a fuller response by 23 June 2025 in response to the Secretary of State's request for information (Consultation 3) dated 30 May 2025.</p>
Paragraph 16	<p>Proposed Designation of New National Park</p> <p>Following the inclusion of a commitment in our Programme for Government for 2021-26, the Welsh Government has asked NRW, as our statutory advisers on Designated Landscapes, to take forward a programme of work to consider designating a new National Park based on the Clwydian Range & Dee Valley National Landscape.</p> <p>Following a period of engagement in 2023, and a public consultation on a Candidate Area in 2024, NRW are working towards a statutory consultation on a Designation Order in the Autumn of 2025. The outcome of this consultation will inform a final decision by NRW on the making of the Order and submission to Welsh Ministers, together with supporting documentation, for consideration by Welsh Ministers.</p> <p>It is anticipated that any Designation Order would be sent to the Welsh Ministers by the end of 2025.</p> <p>At this stage it is unknown if there will be a need for Welsh Ministers to consider the need to call a public inquiry prior to determining whether to confirm, amend or refuse to confirm the Order.</p>	<p>Noted.</p>