

MONA OFFSHORE WIND PROJECT

Hearing Summaries ISH1

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Image of an offshore wind farm

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ISSUE SPECIFIC HEARING 1: TUESDAY 16 JULY

This document presents a written summary of Mona Offshore Wind Limited's (the Applicant) oral case at Issue Specific Hearing 1 (ISH 1) on the Scope of Development (Table 1.1). ISH 1 on the Mona Offshore Wind's Development Consent Order (DCO) application took place on 16 July 2024 at 14:00pm at Venue Cymru, Promenade, Llandudno, LL30 1BB.

Table 1.1: Written summary of the Applicant’s oral submission at ISH1

ID	Agenda Item	Summary of oral submissions
3 Scope of the Proposed Development		
(a)	Points of clarification about, and the rationale for, the proposed Works described in Schedule 1 of the draft Development Consent Order (Draft DCO) [AS-010] and the Works Plan [AS-003 and AS-004] (onshore, offshore and intertidal).	<ol style="list-style-type: none"> 1) The Applicant confirmed that the hatching in the Works Plan – Onshore (AS-003, Sheet 11) at Work Nos. 24 and 27 to the north of the onshore substation is the overlay of the markings to indicate Work Nos. 24, 25, 27 and 29 and not a separate Work No. The Applicant confirmed that it is not standard practice to label hatching where there are a number of overlapping areas on works plans, and instead it is normal to distinguish each Work No. by reference to the key. 2) The Applicant confirmed that the new sustainable drainage work identified in Schedule 1, Part 1 of the draft development consent order (Draft DCO) (PDA-003) as part of Work No. 22 is to cover drainage works which are designed to connect into Work No. 23 where the sustainable drainage solution to deal with drainage coming from the onshore substation platform is located. 3) The Applicant confirmed that Work No. 22a is within Work No. 22. The approach to overlapping Work Nos. is to start with the wider area as the base area, in this case Work No. 22 which contains utilities connections amongst other works, and then consider Work No. 22a which adds, inter alia, switchgear and electrical equipment within a smaller area. The Applicant confirmed that it has sought to make overlapping Work Nos. as clear as possible on the Works Plan – Onshore. 4) The Applicant recognised that the relationship between Work No. 23 and Work No. 24 as described in Schedule 1, Part 1 of the Draft DCO requires further clarification. The Applicant confirmed the intention is that the “temporary construction compound and laydown area of up to 150,000m²” referenced in Work No. 24 will in fact also go across Work No. 23 such that the maximum area stated in Work No. 24 also extends over Work No. 23 [Post hearing note: as set out in Table 3.35 of the Environmental Statement - Volume 1, Chapter 3: Project Description (APP-050).] The Applicant confirmed that it will amend the description of Works in the Draft DCO or create an overlay of these areas on the Works Plans – Onshore (AS-003) to provide further clarity. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.] 5) The Applicant confirmed that this application for development consent does not include the relocation of existing overhead lines at the National Grid Bodelwyddan Substation or any of the National Grid extension works. The Applicant understands that alterations to the existing overhead lines there will be included within a separate application for works made by National Grid as part of the National Grid Bodelwyddan substation extension. In terms of other overhead lines, the Applicant does not at this stage believe any overhead lines will need to be relocated but that is subject to detailed design. 6) The Applicant confirmed that a separate temporary construction compound is not being sought within Work No. 25, but the temporary construction compound currently included in this works description is a result of overlap of that Work with Work Nos. 23 and 24. The

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		<p>Applicant confirmed it intends to clarify this point in accordance with point 3(a)(4) (see above). [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>7) The Applicant confirmed that Work No. 27 is the temporary construction access for the onshore substation and at the north end of this Work is the bell mouth access and visibility splay which will be in place for the purposes of construction. The Applicant confirmed that the temporary construction access road goes from the bell mouth to Work No. 22. It overlaps with the permanent onshore substation access road - Work No. 29 - which goes from Work No. 28 to the onshore substation platform (Work No. 22). For the sections which do not overlap with Work No. 29, the temporary construction access will be removed post-construction and the operational access will remain as indicated by Work No. 29.</p> <p>8) The Applicant confirmed that the visibility splay at Work No. 27 would be required for construction only and would be reinstated once no longer needed.</p> <p>9) The Applicant confirmed that Work No. 30 is the existing access to the National Grid Bodelwyddan Substation which will be used for construction purposes but limited to establishing Work No. 28 and then constructing Work No. 27 northwards to the highway. Once this is completed construction traffic will use Work No. 27 for construction access. The Applicant confirmed that once construction is complete, Work No. 30 will be used for operational access.</p> <p>10) The Applicant confirmed that the temporary landscaping, ecological and environmental works at Work No. 31 are temporary and are predominantly to be used for Great Crested Newt relocation areas. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>11) The Applicant confirmed it would review the discrepancy between Work No. 33 which describes 'permanent landscaping' and Work No. 32 which refers to simply 'landscaping'. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>12) The Applicant confirmed that it identified in the Environmental Statement - Volume 3, Chapter 6: Landscape and visual resources (APP-069) that to mitigate the visual effects during operation of the onshore substation, landscape planting and land reprofiling is required. Work No. 33 includes land reprofiling to raise the ground level on the western side of the onshore substation platform so planting can be established at a higher level. [Post hearing note: Table 6.20 of the Environmental Statement - Volume 3, Chapter 6: Landscape and visual resources sets out further detail of the landscape and visual mitigation proposed as part of the Application and confirms this includes earth-shaping.]</p> <p>13) The Applicant confirmed that there is a complete overlap between Work No. 1 and Work No. 2. [Post hearing note: this is shown on the Works Plan - Offshore and intertidal (AS-004).] The Applicant explained that Work No.1 is where the wind turbine generators (WTGs), offshore substation platforms, interconnector and inter-array cables are located and these elements all form part of the generation assets. The Applicant confirmed that at</p>

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		<p>this stage, detailed design has not been undertaken and the Applicant does not know where the offshore substation platforms will be located and therefore where the export cables (Work No. 2) will come out from the generation assets. As such rather than making an assumption on this point, the Applicant has overlapped Work No. 2 with Work No. 1. This includes an overlap of the export cable and offshore substation platforms (in Work No. 2) with Work No. 1. This follows precedent set by other offshore wind farm orders. [Post hearing note: for example the Hornsea Four Offshore Wind Farm Order 2023 took this approach.] Further, the Applicant confirmed that the reason for the width of area of Work No. 2 at the boundary of Work No. 1, the ‘funnel’, is because at this stage the Applicant has not undertaken detailed design including the location of the offshore substation platforms. The export cables (up to 4 export cable circuits) can start anywhere along the width of the array and will come together to form a single corridor to the south of the Mona array at the southern boundary of Work No. 1.</p> <p>14) The Applicant confirmed that the generation assets will only be in Work No. 1 and that the transmission assets are in Work No. 2 and could be within any of the areas shown in grey in the Works Plan - Offshore and intertidal (AS-004).</p> <p>15) The Applicant confirmed Work No. 4 is required for access to the intertidal area, tying in with Work Nos. 3 and 7. The Applicant confirmed that this is for health and safety reasons to support offshore construction activities. As trenchless techniques have been committed to (as set out in the Outline landfall construction method statement (APP-226)) in this area and those activities will go seaward of mean low water (MLW) at the landfall site, there is need for some operatives to be able to access Work No. 3 from the beach (for example divers may need to take access from the beach or in the case of emergencies operatives may need access to the Work No. 3 area). The Applicant confirmed that this will involve minimal access movements through Work No. 4.</p> <p>16) The Applicant confirmed that the width of Work No. 4 covers the beach area down to MLW was informed by discussions with Natural Resources Wales (NRW). Work No. 4 crosses the Traeth Pensarn Site of Special Scientific Interest (SSSI) but not the designated features of the SSSI. This is the reason for the ‘gap’ in the Order Limits. The ‘gap’ is a conservative estimate on the location of those designated features. NRW’s preference was for the Applicant to take access along the beach as far away from the designated features as possible and as close to MLW as possible. Depending on the tide the extent of beach to travel along will change, hence why Work No. 4 extends over the entirety of the beach to MLW. However, only a small corridor of the beach will actually be used.</p> <p>17) Work No. 4 also extends as far as it does because of the location of Work No. 7. Work No. 7 was chosen to make use of an existing parking area. Any vehicles using Work No. 4 will be parked within Work No. 7 and take access to the beach from there. This also means the Applicant does not need to construct a new access to the beach.</p>

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		<p>18) The Applicant confirmed that Construction Design and Management Regulations 2015 requirements mean there has to be support within a defined radius of construction works to support personnel on site. Work No. 5 is required to allow parking of a welfare vehicle to park in close enough proximity to those activities on the beach. The Applicant confirmed that parking the welfare van at Work No. 7 would be too far and operatives would have to walk or drive down the length of the beach in case of emergency. Therefore by placing the welfare van in Work No. 5 it allows for use of an existing pedestrian access from the beach over a shorter distance to Work No. 5.</p> <p>19) The Applicant confirmed that Work No. 6 is an existing access and is required for access to Work No. 8 for monitoring trenchless technique activity undertaken there because of potential stability issues as a result of proximity to Network Rail assets and possible frack out from the drill (which is not anticipated but monitoring is identified for that purpose). The Applicant added that the only access to Work No. 8 is through Work No. 6 and the Applicant's preference is to use existing accesses where possible. The Applicant would only be taking vehicles over Work No. 6 to access Work No. 8.</p> <p>20) The Applicant confirmed there was no intention to access Work No. 8 from Work No. 5 as it is fenced.</p> <p>21) The Applicant noted that the description of Work No. 7 in Schedule 1, Part 1 of the Draft DCO identifies a temporary construction compound. Work No. 7 is not a temporary construction compound, it is just a fenced parking area. The Applicant intends to revise the description of Work No. 7 in the Draft DCO to clarify that position. [Post hearing note: the Applicant will provide this update to the Draft DCO at Deadline 2.]</p> <p>22) In relation to Work No. 10 the Applicant clarified that the reason why the description of Work No. 10 in Schedule 1, Part 1 of the Draft DCO states a maximum area of 30,000m², whereas secondary temporary construction compounds elsewhere are 15,000m², is because within Work No. 10 there is a secondary temporary construction compound of 15,000m² as well as a trenchless technique compound as that is where the start of the landfall trenchless technique works will be located. [Post hearing note: those are the trenchless techniques in relation to the landfall works in Work Nos. 2 to 10.] The Applicant recognised the need to provide greater clarity in respect of the temporary construction compounds for the onshore works and what activities will be undertaken. [Post hearing note: See S_D1_5 Mona Response to Hearing Action Points, Table 2.1 row HAP_ISH2_11 and Annex 4.]</p> <p>23) The Applicant confirmed that construction activities such as joint bays and link boxes are included within associated development in Part 1 of Schedule 2 to the Draft DCO in connection with Work Nos. 3 to 38 (see page 49, category (e) of the associated development descriptions). The Applicant clarified that the reason for the wider section of Work No. 11 is that the Applicant is proposing trenchless crossing of Gwrych Hill and requires flexibility to accommodate a complex trenchless design in advance of finalising the</p>

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		<p>detailed design. [Post hearing note: Please see points 20-24 on the onshore crossing schedule [F5.4.3 F02].] The Applicant noted that Work No. 11 allows for open cut trenching works in Work No. 11.</p> <p>24) The Applicant confirmed that Work No. 16 overlays Work No. 15 allowing the whole area of Work No. 16 to be a temporary construction compound but Work No. 15 will still be present 'underneath'. [Post hearing note: Please see the Works Plans – Onshore (AS-003).]</p>
(b)	<p>Flexibility in project description</p> <ul style="list-style-type: none"> • Project parameters defined in the Draft DCO and assessed in the Environmental Statement. • Offshore array layout, spacing and micro-siting. • Breadth of powers sought. • Benefit of the Order (Article 7 of the Draft DCO) 	<p>25) The Applicant clarified that the Application is not being proposed on the basis of either maximum design scenario (MDS) 1 (which would consist of 96 wind turbine generators (WTGs) at the smallest blade tip height) or MDS 2 (which would consist of 68 WTGs of the largest blade tip height). The Application includes the flexibility to build any number of WTGs in between MDS 1 and 2, they are not presented as alternatives. The Applicant confirmed that the maximum design scenario has been identified on the basis of assessing a worst case scenario, particularly for seascape, landscape and visual impacts. It was never the intention to build the maximum of 96 largest wind turbine generators and the introduction of the rotor swept area parameter secures that. The Applicant confirmed the Explanatory Memorandum would be updated to reflect that. [Post hearing note: The Applicant will provide this update to the Explanatory Memorandum at Deadline 2.]</p> <p>26) The Applicant confirmed that Principle 2 of the layout development principles described in Table 3.7 of Volume 1, Chapter 3: Project Description (APP-050) is a key principle that requires a minimum separation distance of 1,400 metres within and between rows of offshore surface structures. [Post hearing note: this is reflected in the layout principle parameter included in Condition 10 of the deemed marine licence (deemed marine licence) contained in Schedule 14 of the draft development consent order (Draft DCO) (PDA-003).] Principle 5 allows for 25 m installation tolerance centred on the nominal offshore surface structure position, and Principle 6 allows for 100 m of micro-siting in addition to that nominal offshore surface structure position. Principles 5 and 6 together add up to 125m. [Post hearing note: this is reflected in the drafting of Condition 18(1)(a) of the deemed marine licence contained in Schedule 14 of the Draft DCO.] This micro-siting flexibility of up to 125m on the nominal offshore surface structure position is required to allow for avoidance of constraints following approval of the design plan by the licencing authority. When micro-siting at a location is required and principles 5 and 6 together are applied the minimum spacing between two structures (assuming no micro-siting is required to the adjacent structure) could be reduced to a minimum of 1,275 metres. [Post hearing note: where micro-siting is required at two adjacent locations, the minimum separation distance of 1,400 meters could be reduced to 1,150 meters.] The Applicant confirmed that the provision for micro-siting is required for environmental constraints (such as biogenic reefs), archaeological resources or difficult site conditions discovered post approval of the design plan (under Condition 18(1)(a)). [Post hearing note: whilst it is necessary to have the provision to micro-site, if required, the likelihood of needing to micro-site post-approval of</p>

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		<p>the design plan is anticipated to be low as detailed ground investigation work will have fed into the final design plan. Moreover, the need to micro-site up to 125m is lower still and the need for structures at two adjacent locations to need to micro-site is again even lower. See also S_D1_5 Mona Response to Hearing Action Points, Table 2.1 row HAP_ISH2_03.]</p> <p>27) The Applicant confirmed that the north to south orientation committed to in the Outline Fisheries Liaison and Co-Existence Plan (APP-199) is principally driven by engagement with fisheries stakeholders and is secured in APP-199 because this is seen as a key document by fisheries stakeholders. The Outline Fisheries Liaison and Co-Existence Plan is then secured through Condition 18(1)(e)(v) of the deemed marine licence contained in Schedule 14 of the Draft DCO which requires approval of a Fisheries Liaison and Co-Existence Plan in accordance with the outline plan.</p> <p>28) The Applicant confirmed that a design plan is required in relation to the layout of the generation assets. The Applicant is anticipating a condition regulating the layout of the offshore substation platforms in the form of a design plan to be included in the transmission marine licence that will be issued by Natural Resources Wales (NRW). [Post hearing note: See "Project Layout Plan" row of the Marine licence principles document (PDA-005).]</p> <p>29) The Applicant confirmed a review of the description of ancillary works in the Draft DCO would be undertaken to avoid duplication of the associated development and works descriptions. The Applicant confirmed it would review the wording of the Draft DCO alongside other recent DCOs that have included caveats to the description of ancillary works along the lines of 'does not give rise to any materially new or materially different environmental effects identified in the environmental statement'. The Applicant also confirmed a review of the precision of drafting around the associated development would be undertaken. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>30) The Applicant confirmed that Requirement 23 of the Draft DCO is designed to ensure that if a scheme that has been approved under the requirements needs to be amended, the Applicant does not need to apply for a new development consent order or seek additional planning consent and instead updates to those schemes can be agreed through Requirement 23. This also avoids questions arising as to which scheme is binding on the undertaker should amendments be agreed with the relevant authority. The Applicant confirmed a review of the drafting of Schedule 12 would be undertaken to ensure consistency with Requirement 23. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p>
(c)	<p>Additional points raised by SP Manweb</p> <p>Commencement provisions</p>	<p>31) The Applicant confirmed in relation to SP Manweb's submissions that the Applicant is in discussions with SP Manweb and is aware of the issues raised which the Applicant considers can be dealt with by way of protective provisions.</p> <p>32) The Applicant confirmed that it has explained why it is seeking 7 year commencement in the Explanatory Memorandum (AS-014) in paragraph 1.4.1.65. The Applicant added that the</p>

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	<ul style="list-style-type: none"> • Seven year commencement period (Requirement 1(1) of the Draft DCO). • Commencement period extension provision (Requirement 1(2) of the Draft DCO). • Commencement of licensable marine activities (Schedule 14 of the Draft DCO). • Definition of commencement (Article 1 of the Draft DCO) drawing on Planning Act 2008: Content of a Development Consent Order for Nationally Significant Infrastructure Projects (April 2024). 	<p>Mona Offshore Wind Project (the Project) is large, it takes time to move into construction and may need to secure a contract for difference award for which there is no guarantee of timings. The Applicant also clarified that there is a long lead in time for equipment and other elements of the Project. In relation to collaboration, the Applicant confirmed that a 7 year commencement period would allow for greater opportunity for it to work and collaborate with the Morgan Offshore Wind Farm Generation Assets promoted by same partnership (a joint venture of bp and Energie Baden-Württemberg AG). The Applicant added that although the power to extend the development consent order exists the Applicant has not seen it done before and making a change to a DCO has no specified time limits and can take a long time to secure. The Applicant concluded that a 7 year commencement period is not unrealistic and has been previously granted on other projects.</p> <p>33) In relation the Applicant's reference to the Government's urgent need to meet its renewable energy targets as set out in the Planning Statement (APP-050), the Applicant clarified that having the ability to commence up to 7 years from grant does not mean this timeframe would be the target of the Project in terms of commencing. The Applicant clarified that its intention is to commence construction as soon as it can. However, there a number of external influences and constraints which may cause delays to commencement.</p> <p>34) The Applicant confirmed that it has seen projects that have failed at certain milestones for example contracts for difference, and have had to go through the process of redesign and go back out to the market. The Applicant confirmed that it needs to look forward and does not yet understand the particular commercial pressures it may face and requires flexibility to meet the constraints of the market at the time as the offshore wind market changes quickly and involves a number of pressures from different suppliers.</p> <p>35) The Applicant confirmed that the Morgan Offshore Wind Farm Generation Assets application has been accepted for examination and its examination period is due to commence soon. The Applicant confirmed that it would be beneficial for it to collaborate with the Morgan Offshore Wind Farm Generation Assets in terms of procurement, construction contracts and economies of scale. [Post hearing note: the Applicant will include updates to the Explanatory Memorandum to provide further detail on this point at Deadline 2.]</p> <p>36) The Applicant confirmed that a 7 year commencement period does not undermine the ES baseline. Where there are particular sensitivities that have been identified, for example European Protected Species, additional surveys will be undertaken prior to commencement to account for any changes to the baseline. Those changes could happen within a year, 5 years or other period of time. Those surveys are standard practice and are secured through the draft development consent order (Draft DCO) (PDA-003). There is not necessarily a material difference between 5 years and 7 years with regards to the need for additional surveys. That is why those surveys are built into the pre-commencement requirements.</p> <p>37) The Applicant confirmed that if Requirement 1(2) were to be triggered, this would allow an 8 year commencement period. Requirement 1(2) provides for an automatic extension to the</p>

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		<p>period in which the Applicant must commencement development by an additional year if a judicial review claim has been made. This was included under the section 36 Electricity Act 1989 applications. There is precedent now in the Yorkshire and Humber CCS Pipeline Development Consent Order. The Applicant noted that Article 27(2) of the Draft DCO (which follows well precedented drafting) includes an embedded 1 year extension for the compulsory acquisition powers if any judicial review claim is made in relation to the grant of the DCO. The Applicant confirmed that the drafting has been based on drafting from the Town and Country Planning Act 1990 that applied to electricity generation consents under the Electricity Act 1989. The Applicant confirmed it would review the drafting of Requirement 1(2), for example in relation to the term 'proceedings' although noted that the drafting should remain clear. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>38) The Applicant confirmed that if Requirement 1(2) were triggered because of a judicial review claim is made in relation to the grant of the DCO, the onus would be on the Applicant to notify the local authority of a delayed commencement period in order to rely on that provision in seeking to discharge requirements outside of the 7 year period.</p> <p>39) In relation to the commencement provisions in the deemed marine licence, the Applicant confirmed that it would review the drafting in relation to its links with the deemed marine licence and standalone Natural Resources Wales (NRW) marine licence. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>40) The Applicant confirmed that the definition of commencement includes the carrying out of a material operation excluding onshore site preparation works which are defined within the Draft DCO separately. The Applicant noted the wording in the new guidance [Post hearing note: Planning Inspectorate Guidance 'Content of a Development Consent Order required for Nationally Significant Infrastructure Projects' (April 2024).] which says that the exclusion of onshore site preparation works is not acceptable unless appropriate controls are secured in another manner. The Applicant confirmed that onshore site preparation works will be undertaken in accordance with details set out in the relevant outline plans ensuring appropriate controls are secured. The Applicant acknowledged that the requirements in the Draft DCO need to refer to works being carried out in accordance with outline plans. The Applicant submitted that it has not had much input from third parties on the outline plans it has submitted as part of its application and called for local authorities and others to comment on outline plans. The Applicant notes that having reviewed the outline plans, there are some which could be clearer on their application to onshore site preparation works. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p>
(d)	Stages of the authorised project (Requirement 4)	<p>41) The Applicant confirmed Requirement 4 of the draft development consent order (Draft DCO) (PDA-003) provides for the option to stage the construction of the onshore works. The staging of the Project is currently unknown and this information will not be available until the Applicant has a detailed design and contractors lined up. The Applicant submitted that there</p>

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		<p>is the potential to include a separate stages of the Project for each local authority if it is appropriate at the relevant time. The Applicant confirmed it would be within their interest to approach the staging of the Project to avoid any confusion around discharges of requirements and the approach to staging will be agreed with local authorities. The Applicant confirmed it would submit an indicative staging plan for the onshore works subject to detailed design. [Post hearing note: the Applicant has submitted an indicative staging plan S_D1_5.2 Appendix to Response to Hearing Action Point: Indicative Staging Plan .]</p>
(e)	<p>Approach to securing mitigation, monitoring, compensation and enhancement measures</p> <ul style="list-style-type: none"> •The Applicant's mitigation and monitoring schedule [APP-196]. • Relationship of management plans specified within the Draft DCO (drawing on [APP-197] and [APP-211]). •Appropriate use of Articles, Requirements, deemed marine licence (DEEMED MARINE LICENCE) Conditions and management plans to control the authorised project. •Disapplication, other agreements, consents and licences 	<p>42) The Applicant confirmed that it will update the Mitigation and Monitoring Schedule (APP-196) to include specific draft development consent order (Draft DCO) (PDA-003) cross-references now the numbering is fixed. The Applicant agreed to consider whether this document should be certified under Schedule of the Draft DCO. [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p>
(f)	<p>Relationship with National Grid's planned extension of Bodelwyddan substation and changes to overhead line arrangements in this vicinity.</p>	<p>43) The Applicant confirmed it is engaging with National Grid frequently to discuss its connection agreement and through developer forums. The Applicant confirmed it has been told that National Grid's application for planning permission for the extension to the Bodelwyddan substation is imminent but is unable to confirm the status of this application given it is not under control of the Applicant. The Applicant agreed to provide the ExA with an update on the planning application once it has been made. The Applicant agreed to provide a composite works plan showing the Applicant's application, the Awel y Mor development consent order works areas and the National Grid extension application once the information to complete such a plan becomes available. [Post hearing note: see S_D1_5.7 Appendix to Response to Hearing Action Point: Mona Offshore Wind Project and Awel y Môr Offshore Wind Farm Works Plans Overlays.]</p>
<p>4. The approach to marine licensing</p>		
(g)	<p>Interactions between the DEEMED MARINE LICENCE (Schedule 14 of the Draft DCO) and</p>	<p>44) The Applicant confirmed that the application for a marine licence has been made to Natural Resources Wales (NRW) for a standalone marine licence for the Mona transmission assets.</p>

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	<p>separate transmission assets marine licence (ML), including:</p> <ul style="list-style-type: none"> • consistency of provisions; and • mechanism for dealing with the physical overlap in licences 	<p>45) The Applicant confirmed that there is no draft of the transmission marine licence which is why there is a Marine Licence Principles Document (PDA-005). The Applicant confirms that it has sought to try and explain how the deemed marine licence and the standalone marine licence will work together based on recent precedent and to reassure the Examining Authority that certain conditions will reappear in the standalone marine licence. The Applicant recognises this does not take away decision making powers from NRW but acts as guide for the Examining Authority.</p> <p>46) The Applicant confirmed that the deemed marine licence and standalone marine licence will inevitably be different as there are drafting requirements around the deemed marine licence being within a statutory instrument, but that the Applicant has sought to align them as far as possible and explain that through the Marine Licence Principles Document. The Applicant confirmed that the Marine Licence Principles Document was useful as part of the Awel y Môr Offshore Wind Farm Order 2023 application.</p> <p>47) The Applicant confirmed it would provide a track change version of the Marine Licence Principles Document (PDA-005) as against (APP-195). [Post hearing note: see S_D1_27 Marine Licence Comparison submitted at Deadline 1.]</p> <p>48) The Applicant confirmed that the area for the deemed marine licence and standalone marine licence overlap because the Applicant does not yet know where the export cables will start and it would be unreasonable to make an assumption on where they would be at this stage. The Applicant similarly confirmed that they do not yet know where the offshore substation platforms will be located or whether they will be constructed as generation assets or transmission assets. The Applicant clarified that it has included sufficient controls in the draft development consent order (PDA-003) Requirements such that only 4 offshore substation platforms can be constructed as part of the whole project. The deemed marine licence requires the Applicant to submit a design plan to NRW for approval. The Applicant confirmed that it expects a similar approach to be taken in the standalone marine licence. [Post hearing note: See "Project Layout Plan" row of the Marine licence principles document (PDA-005).]</p> <p>49) The Applicant confirmed that it does not yet know whether the offshore substation platforms and inter-connector cables will be transmission or generation assets. The Applicant clarified that the transmission assets will be transferred to Offshore Transmission Owner (OFTO) once the Project is constructed.</p> <p>50) The Applicant confirmed that OFTO transfer will not take place until after construction is complete. At that stage suitable notifications would be provided and the transmission marine licence transferred to the OFTO.</p>
(h)	Approach to licensing decommissioning activities.	No submissions made.

MONA OFFSHORE WIND PROJECT

ID	Agenda Item	Summary of oral submissions
(i)	<p>DEEMED MARINE LICENCE drafting matters, to include:</p> <ul style="list-style-type: none"> • transfer of licence; • timescales for subsequent approvals; • approach to designating a disposal site; and • terminology and points of clarification. 	<p>51) The Applicant confirmed it is reviewing the drafting of article 7 of the draft development consent order (Draft DCO) (PDA-003) in light of comments raised by Natural Resources Wales (NRW). [Post hearing note: the Applicant intends to submit an updated Draft DCO at Deadline 2.]</p> <p>52) The Applicant recognises that specifying timescales for condition discharge approvals in the deemed marine license is not standard for NRW but feel it is important to include for a number of reasons. The first is that this is a nationally significant infrastructure project and conditions need to be discharged in a timely manner. The second is that there are provisions in the Draft DCO in relation to local authority approvals and timings of those and it is also appropriate for those to be in place in respect of NRW. There is also the provision that allows the timescales for approvals to be extended between the parties which provides flexibility if needed.</p> <p>53) The Applicant confirmed it would review the coordinates shown within the offshore order limits and grid coordinates plan and whether a similar plan can be provided for the coordinates set out in table 3 of the Draft DCO. [Post hearing note: Table 3 in Schedule 14, Part 1 of the Draft DCO tabulates the boundary co-ordinates of Work No. 1. Co-ordinates 1 to 13 in Table 3 accord with co-ordinates 1 to 13 in the Offshore Order Limits and Grid Coordinates Plan (PDA-002). Co-ordinates 14a and 15a in Table 3 relate to the southern boundary of Work No. 1 within the wider offshore order limits between the eastern and western confluence with the offshore cable corridor ‘funnel’ which is not a ‘straight line’ as shown in Works Plan – Offshore and intertidal (AS-004). Given that the 13 of the 15 co-ordinates set out in Table 3 of Schedule 14 accord with the Offshore Order Limits and Grid Coordinates Plan (PDA-002), it is the Applicant’s position that an additional grid coordinates plan for Work No. 1 is not necessary. Additionally, it would be inconsistent with the plans submitted alongside the standalone Marine Licence application to Natural Resources Wales.]</p>
5. Changes to the Proposed Development		
(j)	<p>The Applicant will be asked to confirm whether or not it intends to seek to make any changes to the scope of the Proposed Development as a result of the submissions of IPs or any changes in circumstances since submission of the application</p>	<p>54) The Applicant confirmed that it does not currently envisage any changes to the Proposed Development.</p>