

MONA OFFSHORE WIND PROJECT

Response to Hearing Action Points due at Deadline 2

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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Glossary

| Term | Meaning |
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| Applicant | Mona Offshore Wind Limited. |
| Bodelwyddan National Grid Substation | This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project. |
| 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, 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 |

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| Term | Meaning |
|---|--|
| | 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. |
| 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 |

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| Term | Meaning |
|---|--|
| | 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). |
| 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. |

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Acronyms

| Acronym | Description |
|---------|---|
| AfL | Agreement for Lease |
| BEIS | Department for Business, Energy and Industrial Strategy |
| DCO | Development Consent Order |
| EIA | Environmental Impact Assessment |
| EnBW | Energie Baden-Württemberg AG |
| HVAC | High Voltage Alternating Current |
| 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 |
| 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 |
| SoCC | Statement of Community Consultation |
| TCE | The Crown Estate |
| TJB | Transition Joint Bay |

Units

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

1 Response to Hearing Actions Points due at Deadline 2

1.1 Introduction

- 1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at the Issue Specific Hearing 1 on 16 July and Issue Specific Hearing 2 on Wednesday 17 and Thursday 18 July.
- 1.1.1.2 The Hearing Action Points that are listed for Deadline 3, lie with Natural Resources Wales (NRW) and can be seen in Table 1.1.
- 1.1.1.3 The Hearing Action Points that have been designated as delivery at Deadline 2 and have been addressed are in the Table 2.1 and the accompanying appendices.

Table 1-1: Hearing Action Points that will be addressed at Deadline 3.

| Ref. | Directed to | Action | Deadline |
|---------|-------------|--|------------|
| ISH1_14 | NRW MLT | List of any DML drafting matters not yet agreed by NRW MLT at Deadline 3 – Red/Amber/ Green traffic light to indicate the importance of each of the outstanding matters. | Deadline 3 |

2 RESPONSES TO HEARING ACTION POINTS DUE AT DEADLINE 2

Table 2-1: Response to Hearing Action Points due at Deadline 2

| Ref. | Directed to | Action | Applicant's response |
|--------|-------------|---|--|
| ISH1_1 | Applicant | Revisit (Explanatory Memorandum) EM and ensure purpose and effect of every provision is fully explained. The justification should be proportionate to the novelty/controversy. Precedents from other made DCOs is not a sufficient justification on its own. | The Applicant has provided an updated Explanatory Memorandum (Document reference C3 F03) to provide further detailed explanation on the Applicant's approach to the drafting of the draft Development Consent Order (Document reference C1 F04). |
| ISH1_2 | Applicant | Supplement EM to explain how the swept area parameter in the Requirements prevents the larger number of taller turbines being constructed. | The Applicant's updated Explanatory Memorandum (Document reference C3 F03) now includes at paragraph 1.5.1.13 an explanation of the rotor swept area parameter. |
| ISH1_3 | Applicant | Review whether all of the layout principles set out in Table 3.7 of [APP-050] are properly secured in the DCO or DML. Consider the production of a stand alone layout principles document with which Condition 18(1)(a) must accord | The draft Development Consent Order (Document reference C1 F04) now includes at condition 18(1)(a) an obligation to submit a design plan in accordance with the layout principles. A new definition of layout principles has also been added to paragraph 1, Part 1 of Schedule 14 of the draft DCO. |
| ISH1_4 | Applicant | Look closely at definition of further associated development (currently pages 48 & 49 of dDCO [PDA-003]) to: <ul style="list-style-type: none"> - tighten up the drafting and ensure proper definition and limitation of works; - remove duplication between further associated development and ancillary works; - update references to materially new or materially different effects in the dDCO and any other instances of limiting works by ES worst case scenario (including Part 2 of Schedule 1 (ancillary works) | The draft Development Consent Order (Document reference C1 F04), Schedule 1, Part 1, has been updated to tighten up the drafting and remove duplication of the works described. Further updates have not been included to address the drafting around materially new or materially different effects as suggest by the Examining Authority. The Examining Authority referred to precedent for such drafting within the description of associated development regarding "materially new or materially different effects" but the Applicant has not been able to identify where this drafting originates from. The Applicant notes that the description of associated development, both onshore and offshore, already states "further associated development... which fall within the scope of the work assessed by the environmental statement" and in relation to ancillary works "Works within the Order limits which fall within the scope of the work assessed by the environmental statement". |
| ISH1_5 | Applicant | Review drafting of Requirement 23 in light of discussion at ISH1 and ensure read across to Schedule 12 regarding fees for the discharge of Requirements that are subsequently amended. | Paragraph 6(1) of Schedule 12 of the draft Development Consent Order (Document reference C1 F04) has been updated to cross refer to Requirement 23 of Schedule 2. |

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| Ref. | Directed to | Action | Applicant's response |
|---------|-------------|--|---|
| ISH1_6 | Applicant | Review EM in respect of Requirement 1 – Time Limits and expand on rationale for it. | The Applicant's updated Explanatory Memorandum (Document reference C3 F03) now includes at paragraph 1.4.1.80 and 1.4.1.81 an explanation of the 7 year time limit within Requirement 1 of the draft development consent order (Document reference C1 F04). |
| ISH1_7 | Applicant | Consider whether amended drafting to dDCO is needed in respect of Requirement 1 specifically in respect of definition of proceedings and how undertaker would notify parties of Requirement 1(2) having effect. | The Applicant has reviewed the drafting and considers it appropriate for its intended purpose. No further changes are proposed. |
| ISH1_8 | Applicant | Review Schedule 14 of the dDCO in respect of the definition of commencement of licensed marine activities & its relationship with the outline documents identified in Part 1(1) thereof. | Please see the Appendix to Response to WRs: NRW (Document reference S_D2_3.2, row REP1-056.421). |
| ISH1_10 | Applicant | Update mitigation and monitoring schedule [APP196] by specifying precisely how measures would be secured by dDCO/DML and consider whether the schedule could be a certified document in the dDCO | Please see the updated Mitigation and Monitoring Schedule (Document reference J10 F02). |
| ISH1_13 | Applicant | Applicant to consider whether a provision could be included within the DML (and transmission assets Marine Licence (ML)) requiring that the undertaker notifies the licensing authority prior to commencement about whether Works 1c) and d) are being constructed under the DML or transmission assets ML | The draft Development Consent Order (Document reference C1 F04) now includes at condition 18(1)(a) an obligation to confirm whether Work No. 1 limb (c) and (d) will be constructed under the deemed marine licence. |
| ISH_15 | Applicant | Consider provision of a pictorial shape of Table 3 of the DML to delineate the co-ordinates within which the licenced marine activities set out in paragraph 2 must be located. | As set out in paragraph 53, Row 4(i) of the Issue Specific Hearing 1 Summaries F01 (REP1-009), Table 3 in Schedule 14, Part 1 of the draft Development Consent Order (Document reference C1 F04) 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, it is the Applicant's position that an additional grid coordinates plan for Work No. 1 is not necessary. Additionally, it would be |

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| Ref. | Directed to | Action | Applicant's response |
|---------|-------------|--|--|
| | | | inconsistent with the plans submitted alongside the standalone Marine Licence application to Natural Resources Wales. |
| ISH1_16 | Applicant | Add definition of Temporary Construction Compounds (TCC) in Article 2 of the dDCO and update the description of the proposed Works in Schedule 1 of the dDCO to clarify the scope of works in TCCs. | <p>Article 2 of the draft Development Consent Order (Document reference C1 F04) has been updated to include the following definitions.</p> <ul style="list-style-type: none"> • Primary temporary construction compound • Secondary temporary construction compound • Onshore substation temporary construction compound • Transition joint bay temporary construction compound • Onshore substation temporary construction compound <p>Details of what works constitute a temporary construction compound are set out in the Response to Hearing Action Points F01 (REP1-012), row ISH2_11 and Annex 2. The temporary construction compound activities described are already set out in Schedule 1 associated development and do not need to be further described within the works descriptions.</p> |
| ISH2_2 | Applicant | Review Mona Licence Principles Document [PDA-005] in respect of detailed design. | The Applicant has provided an updated Marine Licence Principles Document (Document reference J9 F03) to address comments raised by NRW in their written representation (see Appendix to Response to WRs: NRW (Document reference S_D2_3.2), row REP1-056.291). |
| ISH2_17 | Applicant | Review wording of Requirement 14 and Outline Code of Construction Practice to ensure consistency between them. | The draft Development Consent Order (Document reference C1 F04), Requirement 14, Schedule 2 has been updated to clarify that heavy goods vehicle movements will not take place outside of the identified construction hours. |
| ISH2_32 | Applicant | Requirement 3(1): should the Civil Aviation Authority (CAA) be named? Refer consistently to Defence Infrastructure Organisation / Ministry of Defence. Requirement 3(2): should the CAA also be notified? | <p>With regards to the drafting of Requirement 3(1) the Civil Aviation Authority (CAA) will defer to the Defence Infrastructure Organisation (DIO) Safeguarding on matters relating to lighting that is specifically designed to meet DIO Safeguarding aviation safety requirements. Therefore, the CAA does not need to be a named organisation for which agreement must be sought in regard to changes to the requirements for lighting installed for defence purposes. The Applicant has amended the requirement to consistently refer to Defence Infrastructure Organisation Safeguarding.</p> <p>Regarding Requirement 3(2), the Applicant has added reference to the CAA. Please see the draft Development Consent Order (Document reference C1 F04).</p> |

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| Ref. | Directed to | Action | Applicant's response |
|------------|-------------|---|--|
| ISH2_33 | Applicant | Should DML condition 15(5) also apply in the event of damage to the authorised scheme, by reference to condition 13(12)? | The draft Development Consent Order (Document reference C1 F04) has been updated to clarify that in Schedule 14, Part 2 Condition 15(5) will also apply to circumstances set out in Condition 13(12). |
| ISH2_35 | Applicant | Review whether mitigation of the Proposed Development's seascape impact should be secured in the dDCO in addition to/as well as the DML | The Environmental Statement – Seascape and Visual Resources (APP-060) has, at Table 8.18, identified measures to be adopted as part of the Project which act as mitigation for seascape impacts. These identify the offshore wind turbine generators as being painted light grey and that lights will be operated at the lowest permissible intensity level. The colouring of the wind turbine generators is secured in Schedule 14, Part 2, Condition 14(2) of the draft Development Consent Order (Document reference C1 F04) (Draft DCO). The operation of lights at lowest permissible level is secured in Schedule 2, Requirement 3(3) of the Draft DCO. Both of these secure the mitigation within the Draft DCO. It is therefore not necessary for the securing of mitigation to be included in both the Requirements <i>and</i> Conditions for the mitigation to be relied on within the seascape impacts assessment. The wording of the Draft DCO takes into account the appropriate place for securing mitigation in line with the relevant authority that would be tasked with enforcing that mitigation. In respect of aviation lighting, the enforcement authority would be the Secretary of State as the matter relates to aviation safety and it would be for the Ministry of Defence to raise any enforcement queries with the Secretary of State. On the other hand, the colouring of turbine structures is secured as a Condition of the deemed marine licence because it relates to the discharge of design details by Natural Resources Wales. This mitigation is therefore already secured in the appropriate places. |
| ISH2_36 | Applicant | Add lightning conductors to Figure 1.2 of Design Principles Document [APP-189] and visualisations. | Figure 1.2 of the Design Principles Document has been updated to include indicative locations of lightning conductors (J3 F02). Selected visualisations have been updated to include lightning conductors and are presented in Appendix HAP Updated Substation Visuals (S_D2_41). |
| ISH2_39 | Applicant | Review wording of Requirements 7 and 8 of the dDCO. | Requirements 7 and 8 (Schedule 2) of the draft Development Consent Order (Document reference C1 F04) have been reviewed. Appropriate updates have been made to the drafting with further explanations set out in the Schedule of Changes (Document reference S_PD_6 F02). |
| ISH2_40 | Applicant | Provide indicative dimensions (e.g., length, width) for the general arrangement of the substation layout. | Figure 1.2 of the Design Principles Document has been updated to include indicative dimensions (J3 F02). |
| ISH2_43(1) | JNCC & NRW | Review Requirement 5 of dDCO in respect of its relationship with the proposed design guide. | It is not correct for Requirement 5 to refer to the design guide. The intention of the Requirement is that details submitted in relation to the onshore substation will |

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| Ref. | Directed to | Action | Applicant's response |
|---------|-------------|---|---|
| | Advisory | | accord with the design principles (which are set out in Design Principles (Document reference J3 F02)). The submission of those details for the onshore substation to the relevant local authority will result in a design guide as the output. The design guide will then feed into the design and implementation of the onshore substation works. |
| ISH2_51 | Applicant | Review when Requirement 9 takes effect. | A new sub paragraph (4) has been added to Requirement 9, Schedule 2 of the draft Development Consent Order (Document reference C1 F04). This requires onshore site preparation works to be carried out in accordance with the details set out in the outline Code of Construction Practice. This addresses the Examining Authority's concerns regarding the controls which will be applied to onshore site preparation works. The Applicant also refers the Examining Authority to Requirements 11 and 12 where additional controls have been placed with regards to landscape and ecology and archaeology. |