

MONA OFFSHORE WIND PROJECT

Response to October Hearing Action Points

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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MONA OFFSHORE WIND PROJECT

Glossary

Term	Meaning
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 Applicant’s response to October Hearing Actions Points

1.1 Introduction

- 1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at Issue Specific Hearing 3 on 16 October, Issue Specific Hearing 4 on 23 October and Issue Specific Hearing 5 on 24 October 2024.
- 1.1.1.2 Any Hearing Action Points that stated at Deadline 4 that further information would be provided at Deadline 5 is in Section 2.
- 1.1.1.3 Any Hearing Action Points that were identified as being completed for Deadline 5 are also in Section 2.
- 1.1.1.4 The Hearing Action Points that have been designated as delivery at Deadline 6 or later are listed in Table 1.1, and Table 1.2.

Table 1.1: Hearing Action Points from ISH4 that will be addressed at Deadline 5 or later.

Ref.	Directed to	Action	Deadline
25	Applicant	In the next update of the Commercial Side Agreements Tracker, explain the reason for including both NATS (Services) Limited and NATS (En Route) Plc.	D7 (or when the tracker is next updated)

Table 1.2: Hearing Action Points from ISH5 that will be addressed at Deadline 5 or later.

Ref.	Directed to	Action	Deadline
27	Applicant	Submit an updated dDCO at D6 (and D5 if required).	D6 (D5)

2 RESPONSES TO OCTOBER HEARING ACTION POINTS

2.1 Applicant's response to Hearing Action Points from ISH3: Environmental Matters due at Deadline 5

Table 2.1: Hearing Action Points from ISH3.

Ref.	Directed to	Action	Applicant's response
10	Applicant	Update design principles document – review list at Appendix A and explain how these matters will be addressed through the design process for the onshore substation.	The Applicant provided responses to Appendix A at Deadline 4 (REP4-036, paragraphs HAP_ISH3_AppA_1 to HAP_ISH3_AppA_6). An updated Design Principles document (J3 F03) has been provided at Deadline 5.
15	Applicant and all Interested Parties	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?	In addition to the Applicant's response to this point at Deadline 4 (REP4-036, paragraph HAP_ISH3_15) the Applicant has submitted a further Community Impact Clarification Note at Deadline 5 (S_D5_28).

2.2 Applicant's response to Hearing Action Points from ISH4: Offshore due at Deadline 5

Table 2.2: Hearing Action Points from ISH4.

Ref.	Directed to	Action	Applicant's response
13	Applicant and Stena Line	Prepare SoCG between Applicant and Stena Line (subject to Stena Line Agreement).	The Applicant confirms that discussions between the parties have commenced and a Statement of Common Ground has been submitted at Deadline 5 (See S_D5_29 Mona and Stena Line SoCG).

2.3 Applicant's response to Hearing Action Points from ISH5: dDCO due at Deadline 5

Table 2.3: Hearing Action Points from ISH5.

Ref.	Directed to	Action	Applicant's response
HAP_ISH5_03	Applicant	Part 1 Article 2: check if definition of 'Commence' should include standalone Marine Licence.	<p>In response to HAP_ISH5_03 the Applicant has further considered the points set out in the Applicant's Response to October Hearing Action Points (REP4-036) and the definition of "commence".</p> <p>The Applicant also notes that Natural Resources Wales' Marine Licensing Team (NRW MLT) have raised questions in their submissions with regards to the position of work in respect of Mean High Water (MHW) and Mean High Water Springs (MHWS) and Mean Low Water (MLW) and Mean Low Water Springs (MLWS) (see Deadline 3 Submission - Cover Letter – REP3-090).</p> <p><u>Offshore Matters</u></p> <p>The development consent order (DCO) provides the overall consent for the construction, operation and maintenance and decommissioning of the Mona Offshore Wind Project. That consent is based on the parameters identified specifically within Requirement 2, Schedule 2 of the draft DCO (C1 F06), and to the extent assessed within the environmental statement.</p> <p>In relation to the offshore works, the standalone marine licence (applied for separately) and the deemed marine licence (contained within Schedule 14 of the draft DCO), will consent the <i>activities</i> which relate to the construction, operation and maintenance of the Mona Offshore Wind Project. Together the standalone and deemed marine licences work to consent all of the licensable marine activities seaward of MHWS.</p> <p>The deemed marine licence (dML) is in respect of licensable marine activities which are well offshore, far from MHWS. It is understood that NRW MLT team do not have any concerns with regards to the dML and the absence of a reference to MHWS.</p> <p>With regards to the standalone marine licence, that will authorise all necessary licensable marine activities seaward of MHWS.</p> <p>In respect of DCO Requirements relating to the offshore works, the Applicant has updated the definition of "commence" in Article 2 of the Draft DCO. This is to clarify that the first carrying out of activities of any kind (whether licensable marine activities or otherwise) relating to the offshore works will trigger commencement, save for those which are specifically excluded. This will ensure that no activities in respect of offshore works may begin before the relevant Requirements are discharged.</p>

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Ref.	Directed to	Action	Applicant's response
			<p><u>Onshore matters</u></p> <p>The onshore works are defined by reference to Work Nos. 3 to 38 and therefore include works within the intertidal zone that also comprise licensable marine activities. This follows the precedent set by the Awel y Môr Offshore Wind Farm Order 2023 in which the onshore works also comprised works within the intertidal zone. This approach was accepted by the Secretary of State and the Applicant does not consider there to be any deviation from that position between Awel y Môr and this Application. The local planning authority is the discharging authority for the relevant requirements (in consultation with Natural Resources Wales) in respect of the intertidal area. As such, documents to be discharged under Requirement 9 (Code of Construction Practice) of the draft DCO, including the landfall construction method statement, will be approved by the relevant local authority (which will be Conwy County Borough Council for the landfall area) in consultation with NRW. All relevant details pertaining to the construction of the trenchless cable installation at landfall will be included in that final landfall construction method statement.</p> <p>It is not necessary for the works delineated with a DCO to align with MHWS / MLWS. As a result, there is no legal issue with regards to the Applicant's use of MHW / MLW for its Works Plan – Onshore (AS-003).</p> <p><u>Conclusion</u></p> <p>The Applicant is confident that the legal position is robust in respect of the above matters. With the update at Deadline 5 made to the definition of “commence” the Applicant considers that it is clear that all Requirements will be discharged in accordance with the specified triggers and, where necessary, prior to commencement of offshore activities. Further, the Applicant is confident that the DCO will consent all necessary works and together the dML and standalone marine licences will consent all the necessary licensable marine activities.</p>
HAP_ISH5_04	Applicant	Part 1 Article 2: consider definition of 'Maintain' and inclusion of wording to preclude total replacement of reconstruction of the onshore substation.	<p>The Applicant has undertaken a further review of the definition of maintain in Article 2 of the draft development consent order (Document Reference C1 F06) (draft DCO) and in the deemed marine licence (Schedule 14 of the Draft DCO) against the definition added to The Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024 (the SEP & DEP Order) by the Secretary of State. The Applicant does not consider that adoption of the wording used in the SEP&DEP Order would work in the context of the draft DCO, not least because it uses terminology that is not relevant to or used in the draft DCO. The Applicant raised concerns during Issue Specific Hearing 5 about the application of the definition in practice working to unduly restrict the undertaker's ability to carry out essential maintenance works. This includes for example concerns around how the definition would apply to maintenance works during construction, for example, the wording casts doubt on whether the onshore substation foundations could be replaced during construction in the event a</p>

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Ref.	Directed to	Action	Applicant's response
			defect was identified before the whole of the onshore substation building was constructed. Upon further review, those concerns remain. The Applicant has however made amendments to the definition of 'maintain' in both Article 2 and the deemed marine licence which it considers offer greater clarity as to the extent of maintenance works which can be undertaken.
HAP_ISH5_06	Applicant/Council	Article 12(1): explain in Explanatory Memorandum (EM) why the article includes any street and whether this is justified and proportionate / Council to consider wording.	The Explanatory Memorandum (Document Reference C3 F05) has been updated at Deadline 5 to provide further explanation of Article 12. Please see paragraphs 1.4.1.44 to 1.4.1.49.
HAP_ISH5_08	Applicant	Expand justification/explanation for Article 17 in the EM.	The Explanatory Memorandum (Document Reference C3 F05) has been updated at Deadline 5 to provide further explanation of Article 17. Please see paragraph 1.4.1.65.
HAP_ISH5_09	Applicant	Article 47: identify the known planning permissions that paragraph (1) would apply to and explain why they would be inconsistent with the proposed development.	<p>The Applicant has fully considered the points raised by the Examining Authority and has made drafting amendments in the draft development consent order (Document Reference C1 F06) (Draft DCO) and further explanation of this within the Explanatory Memorandum (Document Reference C3 F04) at Deadline 5. Please see paragraphs 1.4.1.158 to 1.4.1.163.</p> <p>The Applicant considers it necessary to include this provision in the Draft DCO. In particular due to the anticipated overlap between the Mona Order Limits and the National Grid Bodelwyddan Substation Extension application which is expected to be a Town and Country Planning Act 1990 application. Inclusion of Article 47 would ensure there are no issues around incompatibility of the Mona Offshore Wind Farm Order and any consent granted pursuant to that National Grid substation application and that the two can be developed without there being a risk of 'overlapping planning consents' that would be caught by the <i>Hillside Park v Snowdonia National Park Authority</i> case.</p>
HAP_ISH5_10	Applicant	Article 47: update EM to explain what is meant by 'development that is consistent with the authorised development' and 'development that is unrelated to the authorised project' and how this would not circumvent the legislative process for amending a DCO contained in the PA2008.	Please see response to HAP_ISH5_09, which sets out that new drafting for Article 47 has been provided in the draft DCO. This drafting no longer includes the use of terms queried in HAP_ISH5_10 as it sets out the types of development concerned more simply, by reference to the Planning Act 2008 and Town and Country Planning Act 1990.

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Ref.	Directed to	Action	Applicant's response
HAP_ISH5_11	Applicant	Schedule 1 Part 1: remove duplicate co-ordinates 8 and 9.	The duplicate co-ordinates highlighted have been removed from the draft DCO at Deadline 5. The Applicant has updated the offshore order limits and grid coordinates plan (Document Reference B2 F03).
HAP_ISH5_12	Applicant	Requirement 1 (2): consider whether a definition of proceedings is needed and update EM to explain how this would operate in practice in terms of awareness of the additional time.	The Explanatory Memorandum (Document Reference C3 F05) has been updated at Deadline 5 to provide further explanation of Requirement 1. Please see paragraph 1.5.1.12.
HAP_ISH5_16	Applicant	Review and clarify if replacement planting is secured for the full extent of the order limits.	Replacement planting is not secured for the full extent of the order limits. This obligation will continue to apply only in relation to the onshore substation planting and the Applicant does not consider it necessary to provide for replacement planting elsewhere. This does not preclude planting along the onshore cable corridor being managed through the provisions of the final landscape and ecology management plan.
HAP_ISH5_20	Applicant	Requirement 19: consider AyM drafting and consider if appropriate for Mona.	The Applicant has further considered the drafting of Requirement 19 and has provided updates at Deadline 5 (see draft development consent order - C1 F06). As agreed with Denbighshire County Council (see Initial Statement of Common Ground between Mona Offshore Wind Project and Denbighshire County Council (DCC) (S_D3_22 F02), row DCC.DCO.12), the skills and employment plan will be submitted to Denbighshire County Council for approval prior to commencement of the authorised project following consultation with the 'relevant authorities'. Denbighshire County Council will then approve that plan on behalf of all relevant authorities.
HAP_ISH5_24	Applicant	Schedule 10 Pt 4: update DCO with agreed wording.	The protective provisions included in Schedule 10, Part 4 of the draft Development Consent Order (C1 F06) at Deadline 5 have been agreed by SP Manweb. The Applicant understands that SP Manweb will write directly to the Examining Authority to confirm this.
HAP_ISH5_25	Applicant	Offshore In-Principle Monitoring Plan: update penultimate columns of Tables 1.2 to 1.5 to specify for each row which DML condition secures the monitoring.	This information has been included in the Offshore In-Principle Monitoring Plan submitted at Deadline 5 (J15 F02).
HAP_ISH5_27	Applicant	Submit an updated dDCO at D6 (and D5 if required).	The Applicant has submitted an updated Draft DCO at Deadlines 5 (Document Reference C1 F06) and will at Deadline 6 as requested.