

By Email

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Our reference: LAGA/51053001/O158049635.2/JTY

14 January 2025

Dear Caroline Jones

Deadline 7

Representation on behalf of Gwynt y Môr OFTO Plc ("GyM OFTO") relating to the development of an offshore windfarm with an approximate capacity of 1500MW in the Irish Sea (the "Project") by Mona Wind Farm ("MWF" or the "Applicant")

Osborne Clarke are instructed by GyM OFTO to submit this update at Deadline 7 on 14 January 2025 ahead of the close of Examination on 16 January 2025.

GyM OFTO owns and operates the transmission infrastructure for the Gwynt y Môr Offshore Wind Farm. The wind farm comprises 160 wind turbine generators connected onshore by four c.20km subsea export cables, with onshore cables of c.11km long connecting to the 400kV onshore substation at Bodelwyddan, near St. Asaph (the "**GyM Substation**").

GyM OFTO's assets can be grouped into the following categories:

- Offshore cables;
- Offshore substation;
- Onshore cables;
- GyM Substation;
- Grid connection assets; and
- Spare assets.

GyM OFTO is identified in the Applicant's Book of Reference at the following plots:

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Book of Reference Plots	Interest type
11-220, 11-221, 11-228 – 11-229(b), 11-233 – 11-236	Underground electricity apparatus
11-219, 11-223, 11-224	Lessee / Tenant
11-225 – 11-227, 10-188, 11-190 – 11-193, 11-195, 11-197 – 11-200, 11-202, 11-204 – 11-207, 11-211 – 11-216.	Rights granted by deed of 6 November 2009

Please be aware that we cannot offer any guarantee that GyM OFTO's rights are limited to these referenced areas only.

We understand that the Project will include an onshore substation to be located to the south of the existing GyM Substation (Work No. 22 and 22a). MWF are also proposing to construct a permanent access track including utility connections and drainage (Work No. 29) on land immediately to the south of GyM's Substation. This has the potential to impact on GyM's Substation and mitigation land.

On that basis, with the operation of the Project to be located in close proximity to the transmission assets including the GyM Substation, we have specific concerns in relation to:

1. Overlapping planning permissions and the implications of disapplying aspects of GyM OFTO's existing planning permission (ref: 31/2008/1123/PF) including the process for engagement with the local planning authority in respect of any enforcement action;
2. Asset protection and adequate safeguards for GyM OFTO's existing infrastructure, including the interaction with the drainage ditch at plot 11-220 and 11-222; and
3. The need to secure appropriate mechanisms within legal documentation (yet to be agreed) – for example, deeds of consent relating to GyM OFTO's existing property rights and compliance with existing landowner agreements.

Whilst we recognise that the Examination is due to close on 16 January 2025, the negotiations regarding securing the protection of our client's assets, specifically around the GyM Substation, are ongoing. GyM OFTO therefore looks forward to continuing these discussions with the Applicant beyond the close of Examination.

Yours sincerely



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