Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

Secretary of State for Energy Security and Net Zero
C/O Jake Stephens
National Infrastructure Directorate
The Planning Inspectorate
Temple Quay House
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Date: 11 July 2023
Jo Pickard
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11 July 2023

RE: Awel y Môr Offshore Wind Farm DCO Application
FAO: The Rt Hon Grant Shapps MP, Secretary of State for Energy Security and Net Zero

Dear Mr Stephens,

I am writing on behalf of Awel y Môr Offshore Wind Farm Limited (the Applicant) in relation to the Development Consent Order (DCO) application for the Awel y Môr Offshore Wind Farm project (the Project). The DCO Examination of the project began on 20 September 2022 and closed on 20 March 2023. On 20 June 2023, a Recommendation was given by the Planning Inspectorate (PINS).

On 19 April 2023, Preliminary Environmental Information Reports (PEIRs) were published for the Morgan, Mona and Morecambe Round 4 Wind Farm Projects. The Applicant has undertaken a review of the information presented in these PEIRs in respect of their Cumulative Effects Assessments (CEAs). The Applicant has developed a document ("Review of cumulative and in-combination effects") that considers the conclusions of the original AyM CEA (presented in the topic-specific chapters of ES Volumes 2 and 3, as updated at Deadline 8 of the Examination) in the light of that information in order to assist the Secretary of State.

Additionally, the Applicant wishes to provide commentary on the revised draft National Policy Statements (NPSs) for energy EN-1, EN-3 and EN-5 that were published on 30 March 2023, after the close of the Awel y Môr examination. The Applicant has provided a revised NPS tracker that focuses only on the material differences between the drafts published in March and the extant NPSs and previous draft NPSs published in 2021. This document should be read alongside the NPS tracker (REP8-032) and the draft NPS tracker (REP8-030).

Awel y Môr Offshore Wind Farm Ltd.: Registered in England and Wales no. 12270928
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RWE

Should you require any further information on any of the updates above, please do not hesitate to contact us.

Yours faithfully,

[redacted]

Jo Pickard CEnv, MCIEEM
Senior Consents Manager
Awel y Môr Offshore Wind Farm Ltd.

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Awel y Môr Offshore Wind Farm

Review of cumulative and in-combination effects

Post Examination Submission

Date: 11 July 2023

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Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

REVISION	DATE	STATUS/ REASON FOR ISSUE	AUTHOR	CHECKED BY	APPROVED BY
A	July 2023	Post Examination	GoBe/ SLR	RWE/ Burges Salmon	RWE

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1 Introduction

1.1 Project background

1 Awel y Môr Offshore Wind Farm Ltd. (the Applicant), submitted an application for a Development Consent Order (DCO) to the Planning Inspectorate (PINS) on 20 April 2022 for the Awel y Môr Offshore Wind Farm (AyM). This application was accepted for Examination by PINS in May 2022, which opened on 21 September 2022 and was formally closed on 20 March 2023.

2 The appointed Examining Authority (ExA) subsequently prepared its recommendation report, which was received by the Secretary of State (SoS) for the Department for Energy Security and Net Zero (DESNZ) at the end of the recommendation period on 20 June 2023.

3 Since AyM is within Welsh waters, a separate Marine Licence is also required under the Marine and Coastal Access Act 2009. An application was duly made to Natural Resources Wales (NRW) Marine Licensing Team (MLT) on 20 June 2022. The application is currently awaiting determination from NRW MLT, who are anticipated to make a decision shortly after the SoS makes a decision on the DCO.

1.2 Purpose of this document

4 During the Examination of AyM, the ExA asked several questions concerning the Applicant's cumulative effects assessment (CEA) with respect to the level of assessment of the Morgan and Mona offshore wind projects.

5 These questions were asked in the ExA's first, second and third written questions (ExQ1, ExQ2 and ExQ3), with the Applicant's responses provided at Deadline 1 (REP1-007), Deadline 5 (REP5-004), and Deadline 7 (REP7-004). The Applicant also provided a further response to ExQ3.0.7 at Deadline 8 (REP8-039), including commentary on case law in relation to this issue. This document should be read together with those responses for context.

6 In its responses, the Applicant explained that although Morgan and Mona could be classed as Tier 2 developments in terms of PINS Advice Note 17 (having published Scoping Reports), there was insufficient information within those Scoping Reports to enable a meaningful CEA to be undertaken. PINS Advice Note 17 does not provide any specific levels of projects information that are required to be available to class a development as Tier 2, only that a Scoping Report is available. Therefore, there were practical limitations on the availability of data that meant a meaningful CEA was not possible.

7 At Deadline 8 (REP8-039), the Applicant stated that if there was a change in position due to the publication of substantial assessment material in respect of Morgan and Mona, it would review the position and it would be open to the SoS to seek submissions on CEA and consult upon them before reaching a final decision.

8 On 19 April 2023, Preliminary Environmental Information Reports (PEIRs) were published for the following projects, as part of the formal consultation period under Section 42 of the Planning Act 2008 that closed on 4 June 2023:

- Mona Offshore Wind Farm, developed by BP and EnBW ("Mona");
- Morgan Offshore Wind Farm Generation Assets, developed by BP and EnBW ("Morgan"); and
- Morecambe Offshore Wind Farm Generation Assets, developed by Cobra and Flotation Energy ("Morecambe").

9 Note that the PEIR for Mona considered the whole scheme, however the PEIRs for Morgan and Morecambe considered the generation assets only, since the transmission assets for those projects are being consented separately.

10 The Applicant has undertaken a review of the information presented in these PEIRs and considers that they include sufficient assessment detail to undertake a review of their conclusions against the conclusions of the original AyM CEA. This document considers the conclusions of the original AyM CEA (presented in the topic-specific chapters of ES Volumes 2 and 3, as updated at Deadline 8 of the Examination) in the light of that information and any potential for additional Likely Significant Effects (LSE).

1.3 Methodology

11 This document has been prepared to supplement the CEA already undertaken for AyM within the topic-specific chapters of Volumes 2 and 3 of the ES, and the in-combination section of the RIAA (REP8-055). The methodology for the CEA was presented within Section 4 of APP-042 and this supplementary document follows the same approach, now including the information that has been made publicly available on Mona, Morgan and Morecambe on their respective project websites.

12 Cumulative effects can only occur where there is the potential for both spatial and temporal interaction between impacts arising from AyM and other plans, projects and activities. The screening criteria applied to each EIA topic are described in APP-042.

13 This supplementary review has been completed on a topic-by-topic basis. Consideration as to the implications of Mona, Morgan and Morecambe for the AyM CEA is given in Section 2 of this document.

1.3.1 Onshore

14 Onshore, it is only Mona that has been considered in respect of its implications for the AyM CEA, since Morgan and Morecambe are proposed to make landfall in North-West England as described above, and this infrastructure is to be consented separately. Given the distance between the onshore elements of Morgan and Morecambe and the onshore elements of AyM there is considerable separation between potential onshore receptors and onshore cumulative effects are not predicted to occur.

15 The information published in respect of the onshore aspects of the Mona project included the following:

- A landfall within an area located to the north and northwest of Abergele (approx. 9 km to the west of the landfall for AyM);
- An onshore substation (OnSS) located near the existing National Grid (Bodelwyddan) substation; and

- Buried onshore export cable(s) comprising up to four circuits occupying a final corridor approximately 30 m wide and approximately 18 km in length (the Mona PEIR assessment has been undertaken on a corridor up to 100m).

16 The onshore cables would be routed south from the landfall at and pass to the west of Abergele, then southeast towards the A548 and B5381 junction and then northeast in the vicinity of the B5831 (Glascoed Road) before turning east towards the existing National Gird (Bodelwyddan) substation, running south of Glascoed Road. As the Mona onshore export cable(s) approach the existing National Grid substation they are approximately 300 m southwards of the AyM onshore ECC (from around Groesffordd Marli and eastwards of this point). The onshore cable(s) for both projects diverge away from each other westwards of Groesffordd Marli.

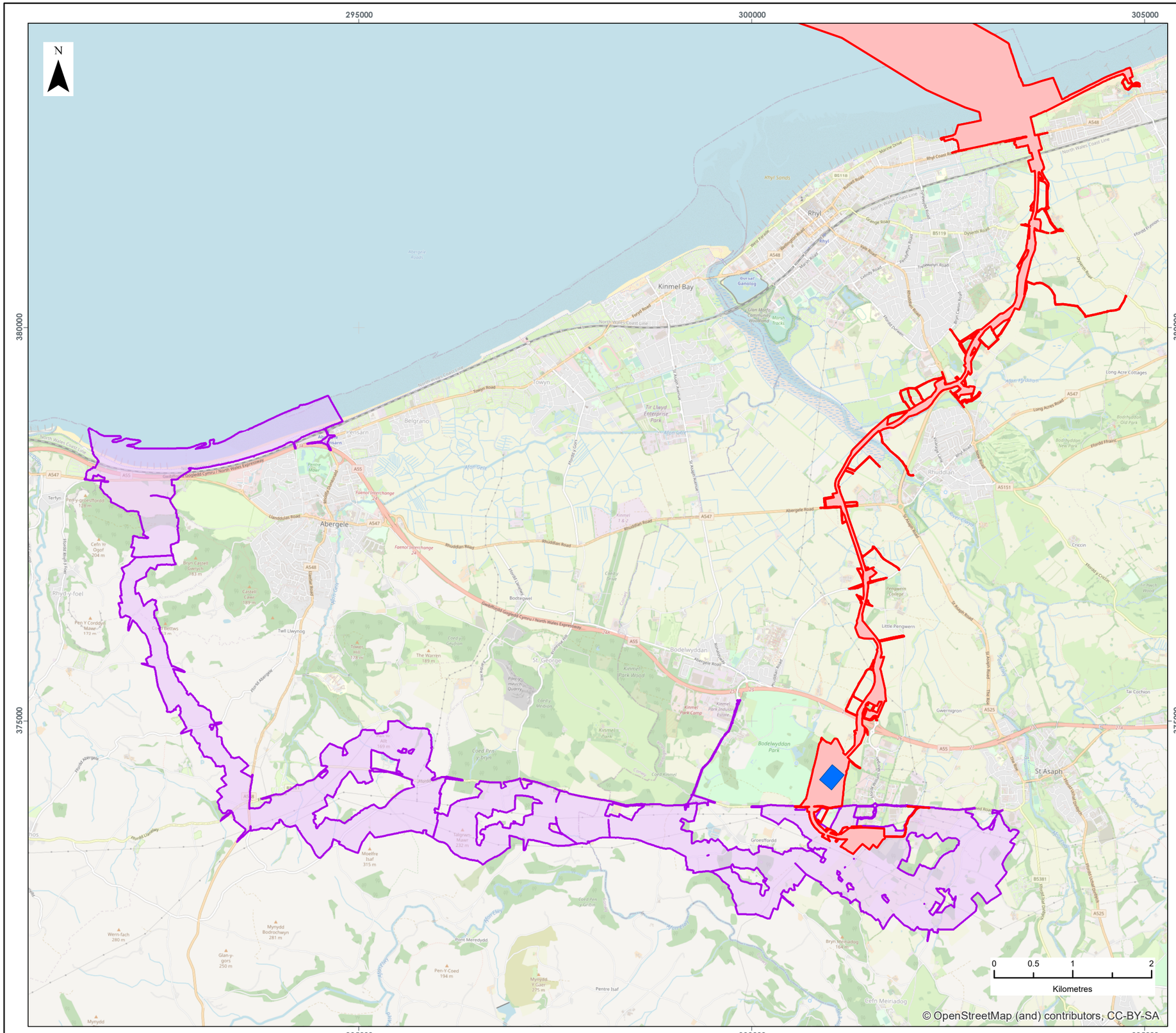
17 There are a number of areas where temporary construction compounds could be sited within the Mona Proposed Onshore Development Area. These include potential locations adjacent to Glascoed Road that intersect with the AyM order limits to the south and southwest of the AyM OnSS.

18 Two locations are under consideration for the location of a proposed OnSS for the Mona Project; Option 2 (also referred to as Option A) and Option 7 (also referred to as Option B):

- Mona substation Option 2 is immediately south of the existing National Grid (Bodelwyddan) 400 kV substation. Mona Option 2 is referred to as Option A within the Mona draft DCO. The Mona Option A substation development works are included within Mona Works area 16A which is approximately 900 m from the AyM OnSS footprint at its nearest point. The construction compound for this option would be located to the east of the substation (as shown in Mona PEIR Volume 1, Chapter 3, Figure 3.20)
- Mona substation Option 7 is east of the existing National Grid (Bodelwyddan) substation, near to Pen-rhew and southeast of St. Asaph town. Mona Option 7 is referred to as Option B within the Mona draft DCO. The Mona Option B substation development works are included within Mona Works area 17 which is approximately 1750 m from the AyM Onss footprint at its nearest point.

19 The Mona substation footprint would be up to 12.5 Ha with a maximum building height of 20 m. Construction works access would be from Glascoed Road with an access point located either to the west or east of St Asaph Business Park. The construction compound for both options would be located to the east of each substation option (as shown in Mona PEIR Volume 1, Chapter 3, Figure 3.20).

20 The onshore location of Mona in relation to AyM is shown in Figure 1.



LEGEND

- Awel Y Môr Order Limits
- Awel Y Môr Substation Compound
- Mona Onshore Works Plan Areas

Data Source:

PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

Onshore Works Areas

VER	DATE	REMARKS	Drawn	Checked
1	09/06/2023	For Issue	BPHB	RM

FIGURE NUMBER:

Figure 1

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
1:50,000	A3	OSGB 1936	BNG

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1.3.2 Offshore

21 In the offshore environment, Mona, Morgan and Morecambe have been considered in respect of the recent information published in the PEIRs for those projects. Of these, Mona is the closest to AyM (the array areas are 12.2 km at the closest point) and is proposed to make landfall near Abergele on the North Wales coast, west of the AyM landfall.

22 Morgan and Morecambe are located further north and are located 28.9 km and 46.3 km from the AyM array at their closest points. Morgan and Morecambe are proposed to share an offshore Export Cable Corridor (ECC) which will make landfall near Blackpool on the coast of North-West England.

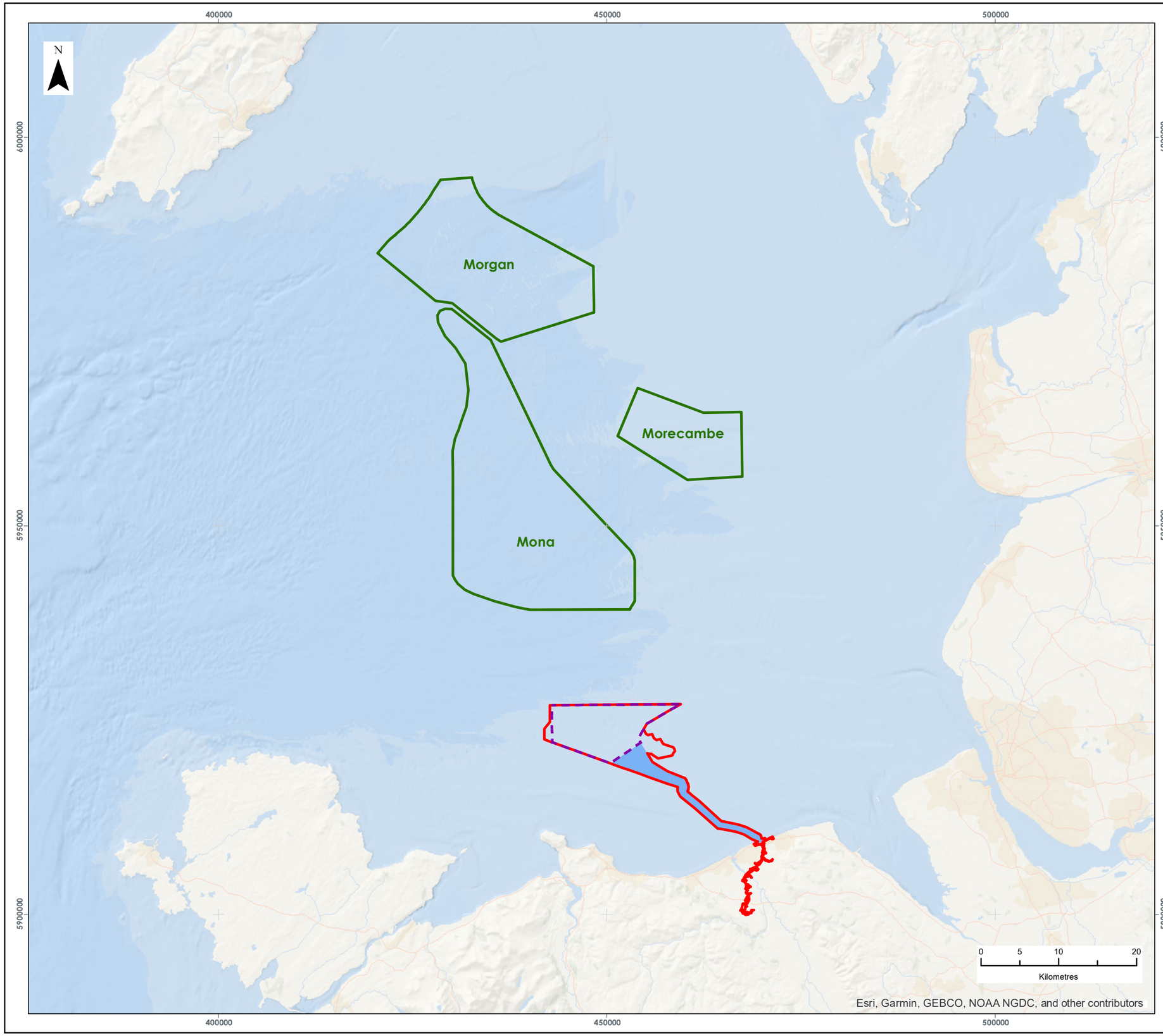
23 The PEIRs provide project information concerning:

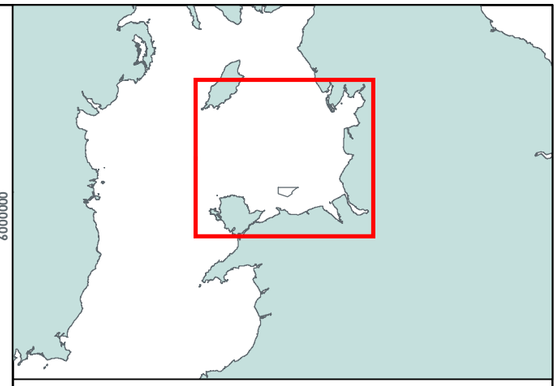
- Array areas containing Wind Turbine Generators (WTGs) inter-array cables, Offshore Substation Platforms (OSPs) and associated infrastructure; and
- Offshore ECC (Mona only) containing offshore export cables.

24 It should be noted that a PEIR has not been published for the Morgan and Morecambe transmission assets, and therefore there is still insufficient information in the public domain to enable a detailed consideration of the effects of these assets cumulatively with AyM. The Morgan and Morecambe transmission assets are likely to consist primarily of a cable installation campaign offshore, which would not be expected to have far-reaching effects. Due to the localised nature of impacts from such activities, as well as the distance between AyM and these assets, it is not anticipated that these could result in additional significant cumulative effects.

25 Therefore, this consideration of cumulative effects focuses on Mona (generation and transmission assets), and Morgan and Morecambe (generation assets only).

26 The offshore locations of the PEIR areas Mona, Morgan and Morecambe are illustrated in Figure 2.





LEGEND

- Order Limits
- Array Area
- Offshore Export Cable Corridor
- Round 4 Offshore Wind Farms

Data Source:

PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

Round 4 Offshore Wind Farms

VER	DATE	REMARKS	Drawn	Checked
1	09/06/2023	For Issue	BPHB	RM

FIGURE NUMBER:

Figure 2

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
1:500,000	A3	WGS84	UTM30N

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1.3.3 Programme

27 The indicative offshore construction programme presented in the ES for AyM commences in 2026 and is anticipated to take place until 2030, when the project will be fully commissioned, and the operational phase will begin.

28 The indicative construction programmes for Mona, Morgan and Morecambe also anticipate construction commencing in 2026 and therefore there is potential for temporal overlap of construction and operational activities.

2 Review of the AyM CEA

2.1 Overview

29 Table 2 provides consideration of the potential for additional cumulative Likely Significant Effects (LSE) to occur in addition to those identified in the AyM CEA. Agreement on the conclusions of the CEA formed part of the Agreements Logs contained within the Statements of Common Ground (SoCGs) with the regulators and stakeholders of relevance to each topic.

30 A summary of these considerations and conclusions are presented in Table 1.

Table 1: Summary of the consideration of the potential effects of Mona, Morgan and Morecambe cumulatively with AyM.

TOPIC	AYM CEA CONCLUSION	POTENTIAL FOR SIGNIFICANT EFFECTS TO OCCUR CUMULATIVELY WITH AYM?			ADDITIONAL CUMULATIVE LSE?
		MONA	MORGAN	MORECAMBE	
Marine geology, oceanography and physical processes	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Marine water and sediment quality	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Offshore ornithology	No potential for significant cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE.
Benthic subtidal and intertidal ecology	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Fish and shellfish ecology	No potential for significant cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE.
Marine mammals	No potential for significant cumulative effects identified.	Yes	Yes	Yes	Not possible to rule out, however, based upon the commitments by Mona, Morgan and Morecambe to undertake further assessment and consider mitigation if necessary, it is expected that measures will be secured to ensure that significant cumulative effects will not arise.
Commercial fisheries	No potential for significant cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE.

TOPIC	AYM CEA CONCLUSION	POTENTIAL FOR SIGNIFICANT EFFECTS TO OCCUR CUMULATIVELY WITH AYM?			ADDITIONAL CUMULATIVE LSE?
		MONA	MORGAN	MORECAMBE	
Shipping and navigation	No potential for significant cumulative effects identified.	No	No	No	No – Effects all remain minor and no LSE.
Seascape, landscape and visual impact assessment (SLVIA)	AyM in-isolation assessment concluded multiple potentially significant effects. AyM CEA concluded that there would be no significant cumulative effects resulting from the addition of AyM to a context containing operational, under-construction, consented, application or scoping stage cumulative development.	Yes	Yes	Yes	It is not possible to rule out additional cumulative LSE. However, the only potential for significant effects is in relation to the Mona project and receptors on the Isle of Anglesey. This is based upon a highly precautionary approach using the array information provided in the Mona PEIR, which may be subject to further refinement. Even if such effects were to arise, they would not affect any special qualities of the Anglesey AoNB that are already affected by AyM alone. In addition, such effects will be given appropriate consideration by Mona in its ES as it progresses to the DCO application and examination phases, including consideration of further mitigation (if necessary) and consultation with statutory consultees.
Offshore archaeology and cultural heritage	No potential for significant cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE.
Other marine users and activities	No potential for significant cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE.
Military and civil aviation	No potential for significant residual cumulative effects identified.	Yes	Yes	Yes	No – Effects all remain minor and no LSE on the basis that all projects agree to deliver mitigation solutions (as AyM has done).
Landscape and visual impact assessment (LVIA)	Predicted cumulative effects will not exceed the level of effect predicted for AyM when considered in isolation	Yes	No	No	No – Additional cumulative effects identified, however these will not exceed those predicted in the AyM LVIA.

TOPIC	AYM CEA CONCLUSION	POTENTIAL FOR SIGNIFICANT EFFECTS TO OCCUR CUMULATIVELY WITH AYM?			ADDITIONAL CUMULATIVE LSE?
		MONA	MORGAN	MORECAMBE	
Socio-economics	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Tourism and recreation	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Biodiversity and nature conservation	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Ground conditions and land use	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Hydrology, hydrogeology and flood risk	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Onshore archaeology and cultural heritage	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Traffic and transport	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Noise and vibration	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.
Air quality	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.

TOPIC	AYM CEA CONCLUSION	POTENTIAL FOR SIGNIFICANT EFFECTS TO OCCUR CUMULATIVELY WITH AYM?			ADDITIONAL CUMULATIVE LSE?
		MONA	MORGAN	MORECAMBE	
Public health	No potential for significant cumulative effects identified.	Yes	No	No	No – Effects all remain minor and no LSE.

Table 2: Consideration of the potential effects of Mona, Morgan and Morecambe cumulatively with AyM.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
EIA Topics	
Marine geology, oceanography and physical processes	Morgan and Morecambe are sufficiently distant (46.3 km and 28.9 km, respectively) from AyM such that there is no potential for effects to occur cumulatively with AyM. Mona is located 12.2 km from AyM at its closest point, within the Zone of Influence (ZoI) of potential impacts from AyM and impacts have the potential to coincide. Mona therefore has the potential to act cumulatively on the hydrodynamic and/or wave regime through interaction with foundation structures. While there is therefore potential for effects to occur cumulatively with AyM, the orientation of the spring tidal excursion ellipses along which currents extend is primarily east to west, and therefore any potential effect of any magnitude is highly unlikely to overlap with, or act cumulatively with, any potential effects from AyM. Mona undertook numerical modelling of the potential impacts and identified the potential change to result in negligible cumulative effects (immeasurable in practice), in line with the conclusions of the AyM assessment which similarly did not identify any potential for significant cumulative effects. It is therefore concluded that there is no potential for measurable cumulative effects on currents or waves between AyM and Mona, and no change to the AyM CEA conclusion of no significant effect. Because of this, there is also no potential for measurable cumulative effects on resulting patterns of sediment transport.
Marine water and sediment quality	Morgan and Morecambe are sufficiently distant (46.3 km and 28.9 km, respectively) from AyM, such that there is no potential for effects to occur cumulatively with AyM. The Mona array is located 12.2 km from AyM at its closest point. Based on the information presented for marine geology, oceanography and physical processes in the row above, the Mona array is unlikely to contribute to cumulative effects with AyM. However, the Mona offshore ECC is located 3.6 km from AyM at its closest point, within the ZoI for AyM and activities have the potential to coincide. Mona therefore has the potential to act cumulatively with AyM, contributing to potential impacts on marine water and sediment quality should construction activities occur at the same time. The AyM CEA did not identify any potential significant effects on marine water and sediment quality. Mona provided consideration of potential cumulative increases in suspended sediments and the potential to impact physical seabed features within its Physical Process chapter and concluded that these would be of negligible significance. It is therefore concluded that there is no potential for significant cumulative effects on marine water and sediment quality between AyM and Mona, and no change to the AyM CEA conclusion of no significant effect.
Offshore ornithology	Mona, Morgan and Morecambe are all located within the ZoI for AyM as defined by the foraging ranges of ornithological species relevant to the assessment, and the projects are proposed to be operational over similar temporal periods. There is therefore potential for cumulative effects to occur in terms of displacement and collision risk. Mona, Morgan and Mona incorporated the predicted mortalities from AyM. In terms of displacement effects, the AyM CEA concluded that cumulative effects would be of negligible to minor significance (not significant in EIA terms) at the Biologically Defined Minimum Population Scales (BDMPS) population level. Mona, Morgan and Morgan similarly did not identify any significant cumulative

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	displacement effects. Taking into account the predicted increases in baseline mortality from Mona, Morgan and Morecambe cumulatively with AyM, the percentage increases in baseline mortality remain below 1% when assigned against the relevant regional BDMPS population for each species assessed. It is therefore concluded that there is no potential for significant displacement effects when considering these projects cumulatively with AyM. In terms of collision risk, the AyM CEA concluded that cumulative effects would be of negligible to minor significance (not significant in EIA terms) at the BDMPS population level. Mona and Morgan similarly did not identify any significant cumulative collision effects. However, Morecambe identified a potential moderate effect (significant in EIA terms) on great black-backed gull and suggested that a Population Viability Analysis (PVA) would be required to confirm the population-level effect. This is because the predicted increase in baseline mortality exceeded 1% at the population scale. The Morecambe PEIR (which incorporated cumulative mortality estimates for AyM) identified a potentially moderate cumulative effect (significant in EIA terms) on great black-backed gull from collision risk. AyM similarly identified the potential for moderate (significant) effects on great black-backed gull at the PEIR stage, and subsequently undertook PVA for this species (APP-100) which confirmed that the minimal impact on population growth rate would be indistinguishable from natural fluctuations. It was therefore concluded that cumulative effects on this species would be non-significant in EIA terms. This is agreed with NRW (see SoCG06-3.17 in REP8-048). As a precautionary approach, the AyM PVA considered a number of mortality rate scenarios accounting for the uncertainty in cumulative totals at a population scale, up to a maximum increase of 95 mortalities per annum. Taking account of the confirmed totals from Mona, Morgan and Morecambe, the cumulative total would result in 92.5 mortalities per annum, therefore within the total assessed in the AyM CEA. The AyM assessment considered the potential for this effect on three regionally defined BDMPS populations (South-West and English Channel; West of Scotland; and a combined 'Western Waters' population). The full results of this are presented in Table 2 to Table 4 of the PVA (APP-100). The AyM CEA concluded on the basis of this, that the impact would not be distinguishable from natural fluctuations and would therefore not be significant in EIA terms. Considering the inherent precaution built into the AyM assessment (and those of the other cumulative schemes), combined with the approach to consider the potential effects on three different populations, it is therefore concluded that the AyM CEA conclusion of no significant cumulative effects on great black-backed gull remains valid. Predicted cumulative collision risk effects on all other species were assessed by Morecambe as non-significant and therefore there is no potential for significant cumulative effects for those species, and no change to the AyM CEA conclusion of no significant effect.
Benthic subtidal and intertidal ecology	Morgan and Morecambe are sufficiently distant (46.3 km and 28.9 km, respectively) from AyM such that they are beyond the ZoI established for benthic, subtidal and intertidal ecology (12 km) and therefore there is no potential for effects to occur cumulatively with AyM. The Mona array is 12.2 km from AyM and the offshore export cable corridor is 3.6 km from AyM at its closest point. Impacts also have the potential to coincide, meaning there is potential for cumulative effects on benthic subtidal and intertidal ecology in terms of habitat disturbance, increases in Suspended Sediment Concentration (SCC) and deposition, and colonisation of structures and hard substrate (including by Invasive and Non-Native Species (INNS)). The AyM CEA did not identify any significant cumulative effects on benthic, subtidal and intertidal ecology. Mona similarly did not identify any significant effects due to the widespread nature and resilience of benthic habitats and species in the study area. On this basis, it is concluded that there is no potential for significant cumulative effects on benthic subtidal and intertidal ecology between AyM and Mona, and no change to the AyM CEA conclusion of no significant effect.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
Fish and shellfish ecology	Mona, Morgan and Morecambe are all within the ZoI established in the AyM CEA for underwater noise effects, and there is the potential for noise-generating activities to occur concurrently with AyM. There is therefore potential for effects to occur in terms of underwater noise for these projects cumulatively with AyM Mona is also within the ZoI established in the AyM CEA for increases to SSC and deposition and therefore there is potential for cumulative increases to SSC and deposition to affect fish and shellfish ecology. Morgan and Morecambe are sufficiently distant (46.3 km and 28.9 km, respectively) from AyM such that they are beyond the ZoI established for increases to SSC and deposition (12 km) and therefore there is no potential for effects to occur cumulatively with AyM in terms of this impact. In terms of increases to SSC and deposition, the AyM CEA did not identify any significant cumulative effects on fish and shellfish ecology. Mona similarly concluded that there would be no significant cumulative effects resulting from this impact. On this basis, it is concluded that the AyM conclusion of no significant cumulative effect remains valid. In terms of underwater noise, AyM did not predict that any significant effects would occur on fish and shellfish receptors. Mona and Morgan similarly concluded that effects would be of regional extent, short-term duration, high reversibility and that they would not be significant in EIA terms. The Morecambe CEA likewise concluded no significant effects, except in the case of herring spawning grounds, where Morecambe identified a potential overlap with herring spawning grounds in Isle of Man territorial waters. For this receptor, Morecambe state that further consideration will be given in the Environmental Statement (ES) once further information has been gathered to inform the assessment. On this basis, Morecambe were not able to confirm whether there would be significant effects on this receptor or not. The Applicant stated in its Fish and Shellfish ES chapter (REP8-057) that the Isle of Man herring spawning ground in question is out of range of any potential noise disturbance from piling operations at AyM. On this basis, AyM will not contribute to further noise disturbance on this receptor and therefore the conclusion of no significant cumulative effects remains valid, regardless of the outcome of further assessment to be undertaken by Morecambe. Therefore, it is concluded that there is no potential for significant cumulative effects on fish and shellfish ecology to occur, and no change to the AyM CEA conclusion of no significant effect.
Marine mammals	Mona, Morgan and Morecambe have the potential to contribute to underwater noise and vessel activity within the regional marine mammal study area and therefore there is potential for effects to occur cumulatively with AyM. Mona, Morgan and Morecambe each incorporated the outcomes of the AyM ES within their CEAs. In terms of underwater noise, the AyM CEA did not predict any significant cumulative effects. Mona and Morgan both assessed that potentially significant effects could occur on bottlenose dolphin within the Irish Sea Management Unit (MU) as a result of behavioural disturbance. However, it is noted that the Mona and Morgan PEIRs also state that in the context of the wider population (the Offshore Channel and Southwest England MU plus the Irish Sea MU), the effect would be of minor significance (not significant in EIA terms). Mona and Morgan further state that they will seek to address this potentially significant effect on the Irish Sea MU for bottlenose dolphin at the ES stage, including discussion on any further mitigation measures to reduce the significance of effect through their respective Evidence Plan processes. Therefore, although Mona and Morgan have the potential to result in a moderate (significant in EIA terms) effect on bottlenose dolphin as the projects currently stand, it is expected that further work will be undertaken (including consideration of further mitigation, if necessary) to reduce the effect to non-significant levels. Morecambe predicted that there was the potential for moderate (significant in EIA terms) cumulative effects on harbour porpoise at the population (MU) level, in addition to potentially major (significant in EIA terms) effects on harbour seal. Morecambe noted that these conclusions were based on a highly precautionary assessment that all noise-generating activities could occur at the same time. Morecambe further noted that it would be highly unlikely for this

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	scenario to occur and therefore the conclusions of significant adverse cumulative effects are likely over-precautionary. Furthermore, the Morecambe CEA was based only upon one year of digital aerial survey data, and it is noted by Morecambe that the assessment will be revisited at the ES stage once a full two-year dataset is available. If a potentially significant effect is still identified at the ES stage, Morecambe states that the need for any further mitigation will be considered. Therefore, although Morecambe have identified the potential for significant cumulative effects on harbour porpoise and harbour seal, it is expected that further work will be undertaken by Morecambe at the ES stage (including consideration of further mitigation, if necessary) to reduce effects to non-significant levels. For all other species, no significant cumulative effects were predicted to occur for Mona, Morgan or Morecambe. It is further noted that as is the case with AyM, neither Mona, Morgan nor Morecambe predicted any significant effects from the projects in isolation. In terms of the potential effects of increased vessel activity, the AyM CEA did not predict any significant cumulative effects. The Mona, Morgan and Morecambe CEAs similarly did not predict any significant cumulative effects from vessel activity. On this basis, the conclusions of the AyM CEA in respect of vessel disturbance remain unchanged. Based on the current understanding of the cumulative effects of noise disturbance in the Irish Sea, it is not possible to rule out the potential for significant cumulative effects on bottlenose dolphin, harbour porpoise or harbour seal. However, based upon the commitments by Mona, Morgan and Morecambe to provide further assessment of these effects at the ES stage (including consideration of further mitigation, if necessary) it is expected that measures will be secured to ensure that significant in combination effects will not arise.
Commercial fisheries	Mona, Morgan and Morecambe are all located within the same regional fishing grounds as AyM and construction and operation are anticipated to occur concurrently. Therefore, there is potential for all three projects to contribute to the reduction in access to (or loss of) fishing grounds, and the displacement of fishing vessels leading to gear conflict and increased pressure on fishing grounds, cumulatively with AyM. The AyM CEA did not identify any significant cumulative effects on commercial fisheries receptors. However, Mona and Morgan identified potentially moderate (significant in EIA terms) cumulative effects on the Scottish west coast scallop fleet, primarily as a result of the interaction between the Mona and Morgan projects themselves leading to reduced access to fishing grounds. To mitigate this, Mona and Morgan propose to undertake further work at the ES stage incorporating further mitigation to reduce the effect to a non-significant level, as well as monitoring during the operational phases of Mona and Morgan to confirm the level of effect. Mona and Morgan did not identify any other potentially significant cumulative effects. Morecambe concluded that there was potential for moderate (significant) cumulative effects on commercial fisheries receptors, primarily as a result of the Mona and Morgan projects. Morecambe committed to further communication with those projects to develop a consistent approach to fisheries liaison, co-existence and mitigation. Morecambe noted that the effect of displacement would be directly correlated with the effect of reduced access to fishing grounds, and therefore could also result in a potential moderate (significant) effect. On the basis of the commitment by Morecambe to further engagement with the Mona and Morgan projects, it is concluded that the AyM conclusion of no significant effect remains valid. There is potential for the scallop fleet active in the northern extent of the AyM commercial fisheries study area to also target grounds in the location of the Mona and Morgan projects, however the relative contribution of AyM to this cumulative effect is low based on the relative footprint of the project and in consideration of its location relative to the location to the south of key scallop grounds. Therefore, it is concluded that there is no potential for significant cumulative effects on commercial fisheries receptors to occur, and no change to the AyM CEA conclusion of no significant effect.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
Shipping and navigation	The Navigation Risk Assessment (NRA) undertaken for AyM (APP-111) identified the main routes anticipated to require deviation as a result of AyM. These routes do not interact with Mona, Morgan or Morecambe and as a result there is no change to the in-combination assessment in the AyM NRA. It is also noted that due to the distance between AyM and these projects, there is sufficient navigable sea room available such that a notable cumulative risk would not be created. A key factor in this conclusion is that AyM is located to the south of the Liverpool Bay Traffic Separation Scheme (TSS), whereas Mona, Morgan and Morecambe are located north of this navigational feature. Therefore, there is not anticipated to be any interaction with the majority of vessel routing in this area. This is reflected in the PEIRs for Mona, Morgan and Morecambe which identify that AyM is located clear of major routes and do not identify any routes which intersect AyM cumulatively with Mona, Morgan or Morecambe. In terms of the potential cumulative effects on Search and Rescue (SAR) capability, there is potential for an increase in incidence rates to arise as a result of the projects considered cumulatively with one another. However, given the low baseline incident rates and noting that additional 'self-help' resources which would become available at both AyM and the other cumulative schemes, it is considered highly unlikely that there would be a significant effect at a cumulative level. Therefore, it is concluded that there is no potential for significant cumulative effects on shipping and navigation receptors to occur, and no change to the AyM CEA conclusion of no significant effect.
Seascape, landscape and visual impact assessment (SLVIA)	Mona, Morgan and Morecambe are within the SLVIA CEA study area for AyM and therefore have the potential to impact visual resources cumulatively with AyM. While the AyM in-isolation assessment concluded multiple potentially significant effects, the AyM CEA concluded that there would be no significant cumulative effects resulting from the addition of AyM to a context containing operational, under-construction, consented, application or scoping stage cumulative development. The further information available in the Mona, Morgan and Morecambe PEIRs provides a further degree of understanding of these proposed developments compared to the limited available information at the scoping stage. Both the Mona and Morgan CEAs take account of each other as well as AyM. However, neither Mona nor Morgan take account of potential cumulative effects of Morecambe in their context, and Morecambe does not take account of Mona or Morgan in its context. This is a limitation caused by the timings of publication of the Mona, Morgan and Morecambe PEIR documents. Consideration is therefore given here to the addition of the AyM array area to a cumulative context that contains operational offshore wind farms in addition to Mona, Morgan and Morecambe, following the CEA methodology set out in Section 11 of the AyM SLVIA chapter (REP8-082) in relation to the different geographical parts of the AyM SLVIA study area (namely the seascape and visual receptors in England, Anglesey, Gwynedd, Eryri National Park (formerly Snowdonia), Conwy, Denbighshire and Flintshire). In appraising these potential cumulative effects, consideration has been given to the preliminary assessments, including the figures provided within the Mona, Morgan and Morecambe PEIR chapters. Mona, Morgan and Morecambe have the potential to add a substantial area of development characteristics to the wider seascape to the north of the AyM study area. Parts of these development areas are currently utilized for oil and gas extraction, however the proposed offshore wind farms are likely to have a more widespread influence due to their scale and larger geographic spread. Of these, the addition of Mona would have the most marked effect on the seascape character around the north Welsh coast due to its visibility at closer proximity than Morgan and Morecambe. The addition of the AyM array to this cumulative context would increase the offshore wind development cluster and influence that exists to the north of Wales. It would potentially extend the influence of offshore wind further west than is currently the case, and closer to the coast. The cumulative magnitude of change in seascape character as a

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	result of the addition of AyM to the cumulative context is considered to be medium-low, within seascapes that have a medium-low to medium sensitivity. Therefore, the cumulative effect on seascape would be moderate-minor (non-significant in EIA terms). For visual receptors in England, Mona, Morgan and Morecambe may be visible across a wide expanse of the sea-skyline at ranges of 28-50 km in 'very good' to 'excellent' visibility. These may span across the part of the sea-skyline that lies between the North Wales offshore wind farms and those that are operational west of Morecambe Bay and the Lake District, east of the Isle of Man and which may be visible from the north-eastern parts of the AyM SLVIA study area. While this may be the case, the visualisations available for Mona, Morgan, and Morecambe show that the additional influence of AyM to such views from the English coast would only give rise to a low to negligible cumulative magnitude of change, resulting in moderate-minor to minor effects (not significant in EIA terms). For visual receptors in Anglesey, views of Mona, Morgan and Morecambe will mainly occur from coastal areas and higher ground inland. The closest of these is Mona, which would extend away from the coast over a wide area which would give rise to views across a wide horizontal extent of the sea-skylike in 'very good' to 'excellent' visibility. Both Morgan and Morecambe are unlikely to have a material effect on views from Anglesey, given their distance and, in particular, where they would be perceived as being located 'behind' Mona. The addition of AyM to this cumulative context would result in a further addition of large-scale offshore wind development in views at a similar range from the northern section of the Anglesey coast, and at a closer range to the southern Anglesey coast when compared with Mona. Should Mona be developed within its current proposed boundary, this could introduce visibility of offshore wind development to the setting of the Isle of Anglesey Area of Outstanding Natural Beauty (AoNB), however it is noted that in this case AyM would add cumulatively to this effect rather than it being a 'new' effect, and AyM would partially infill the remaining and separating area of open sea-skyline to the north-east of Penmon Point. The cumulative magnitude of change in views as a result of the addition of AyM to a context that contains Mona, Morgan and Morecambe is considered to be medium low, on receptors that have been assessed as having medium-high to high sensitivity to AyM. The resulting cumulative effect would therefore be of moderate significance (borderline significant in EIA terms) however this is considered to be precautionary in respect of the high sensitivity attributed to receptors in Anglesey. Mona is the closest of the additional cumulative offshore wind developments to Gwynedd, at least 45 km away. At this distance, Mona may be visible on the sea-skyline in views north from Gwynedd potentially across Conwy Bay (in 'excellent' visibility conditions), however, would appear vertically relatively very small, albeit across a wide horizontal extent. Morgan and Morecambe are considered too distant to have a material effect on views from Gwynedd. The addition of AyM to the cumulative context would bring the influence of offshore wind development closer to Gwynedd in views out to sea, and the closer range would make AyM appear comparatively taller, as well as being visible more frequently, however they would not represent a new element to the views in this direction from Gwynedd despite adding to the complexity of views (during periods of 'excellent' visibility). The cumulative magnitude of change in views from Gwynedd as a result of the addition of AyM to the cumulative context is considered to be medium-low and would only occur within views from receptors that have been assessed as having medium to high sensitivity to AyM. The resulting cumulative effect on receptors in Gwynedd would therefore be moderate to moderate-minor (not significant in EIA terms). Mona is the closest of the additional cumulative offshore wind developments to Eryri National Park, at least 35 km away. Mona may be visible on the sea-skyline in 'very good' to 'excellent' visibility conditions, however WTGs would appear of moderate scale vertically, although apparent in a wide horizonal extent. Morgan and Morecambe are considered too distant to have a material effect on views from Eryri National Park. The addition of AyM to the cumulative context would bring the influence of offshore wind development closer to Eryri National Park in views out to sea beyond the Great Orme, often in a similar part of the view that would be affected by Mona, but in some cases creating a visual link between the operational offshore wind farms and Mona. Their closer range would also make AyM appear comparatively taller and more frequently visible compared to Mona, however they would not represent a

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	new element within the views in this direction, although they would add to the complexity of views of offshore wind farms. The cumulative magnitude of change in views from Eryri National Park as a result of the addition of AyM to the cumulative context is considered to be medium-low, on receptors assessed as having medium-high to high sensitivity. The resulting cumulative effect on receptors in Eryri National Park would moderate (non-significant in EIA terms). Mona is the closest of the additional cumulative offshore wind developments to Conwy, at least 28 km away. Mona would be visible in 'very good' to 'excellent' visibility conditions on the sea-skyline in views north of Conwy. Mona may be apparent extending beyond the Great Orme from Conwy Bay in the west, from the Great Orme itself where the turbines could be seen out in the currently open seascape. From further east along the coast, Mona could be seen partly behind operational offshore wind farms located closer to the coast. The potentially large horizontal extent of Mona means that it could be visible across a further wide horizontal extent in views from Conwy. Morgan and Morecambe are considered to be too distant to have a material effect on views from Conwy. The addition of AyM to the cumulative context would bring the influence of offshore wind development closer to Conwy in views out to sea beyond the Great Orme, from the Great Orme itself and across the views from the bays and coastline to the east. This would make AyM appear comparatively taller and AyM would also be visible more regularly than Mona. AyM would not be a new element within these views, although would add to the complexity of views in this direction. The cumulative magnitude of change in views from Conwy as a result of the addition of AyM to the cumulative context is considered to be medium-low, on receptors assessed as having medium-high sensitivity to AyM. The resulting significance of effect on receptors in Conwy would be moderate (not significant in EIA terms). For receptors in Denbighshire and Flintshire, Mona is the closest of the additional cumulative offshore wind developments, approximately 33 and 35 km away, respectively. Morecambe is located approximately 45 km away and could be seen in 'excellent' visibility. These projects could be seen beyond and infilling the gaps between Gwynt y Môr (GyM), Burbo Bank Extension and North Hoyle offshore wind farms. The elevated Clwyidian Range AoNB provides a vantage point from where Mona and Morecambe could be seen extending into the distance and beyond the sea-skyline. Morecambe is considered to be too distant to have a material effect on views from Denbighshire or Flintshire. The addition of AyM to the cumulative context would bring the influence of offshore wind development closer to Denbighshire and Flintshire, however largely in the same parts of views that are already affected by existing offshore wind development. The cumulative magnitude of change in views from Denbighshire and Flintshire as a result of AyM is considered to be low, affecting views from receptors assessed as having medium-high or medium sensitivity to AyM. The cumulative effect on receptors in Denbighshire and Flintshire is therefore assessed as moderate-minor to minor significance (not significant in EIA terms). It is therefore concluded that in light of the recently published information contained within the Mona, Morgan and Morecambe PEIRs, AyM could result in cumulative effects of greater significance than assessed in the AyM CEA, including borderline significant (potentially significant) effects on receptors in Anglesey. Therefore, it is not possible for the Applicant to confirm that the AyM CEA conclusion of no significant cumulative effects remains valid. However, it is noted that the above conclusions are deemed to be precautionary as they are based upon the Mona, Morgan and Morecambe projects as their project boundaries currently stand, and at this stage the extent to which refinements to these boundaries will be made is not known. It is expected that further consideration of potential cumulative effects will be given by Mona, Morgan, and Morecambe at the ES stage, incorporating any project refinement and further mitigation or enhancement that may be necessary for those projects following the statutory consultation phase. Furthermore, it is acknowledged by the Applicant that regardless of these additional cumulative developments, AyM is predicted to result in significant effects on SLVIA receptors from the project alone and has agreed a funding package with the collective Local Planning Authorities of North Wales which is agreed to go some way to indirectly offsetting the adverse effects of AyM predicted (REP8-122). Therefore, while additional cumulative effects could occur, the only potential for significant effects is in relation to the Mona project and the Isle of Anglesey AoNB. This is, however, a highly precautionary approach based on the array information provided in the Mona PEIR. Even if such effects were to arise, they

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	would not affect any special qualities of the AoNB that are unaffected by AyM alone. In addition, such effects will be given appropriate consideration by Mona in its ES as it progresses to the DCO application and examination phases, including consideration of further mitigation (if necessary) and consultation with statutory consultees.
Offshore archaeology and cultural heritage	Mona, Morgan and Morecambe are all located within the 50 km archaeological study area identified in the AyM CEA. There is therefore potential for cumulative effects to occur on archaeological and cultural heritage receptors as a result of physical disturbance and as a result of changes to the hydrodynamic, sedimentary and erosion regimes. It is expected that there will be limited cumulative effects since Mona, Morgan and Morecambe are all undergoing the EIA process which will identify the requirement for appropriate mitigation. This will include the establishment of Archaeological Exclusion Zones (AEZs) and Written Schemes of Investigation (WSIs) detailing additional mitigation. The AyM CEA did not identify any significant adverse effects (but did identify the potential for moderate (significant) beneficial effects). Mona, Morgan and Morecambe did not identify any direct impacts beyond the extent of the development footprint. Similarly to AyM, Mona and Morgan did not identify any significant adverse cumulative effects. Morecambe screened AyM into its CEA and noted that the project should be considered to have potential to result in multiple direct impacts to potential heritage assets which traverse the boundaries of the offshore windfarms, as well as indirect impacts to the setting of designated coastal heritage assets. Morecambe did not undertake this detailed assessment in its PEIR, and go on to state that further assessment will be undertaken at the ES stage to better characterise the potential for cumulative effects at the regional scale, however this is expected to focus on the potential cumulative effects between Morecambe and the Morgan and Morecambe transmission assets (for which no detailed assessment information is yet available). Therefore, it is concluded that there is no potential for significant adverse cumulative effects on archaeology and cultural heritage receptors to occur, and the AyM CEA conclusion of no significant effect remains valid in light of the recently available information contained within the Mona, Morgan and Morecambe PEIRs.
Other marine users and activities	Mona, Morgan and Morecambe have the potential to contribute construction noise to the receiving environment cumulatively with AyM, potentially impacting fish resources with a potential secondary effect on recreational fishing, including charter angling. The AyM CEA did not identify any significant effects on recreational fishing (including charter angling). The Mona and Morgan PEIRs conclude that potential cumulative effects on recreational activities would not be significant in EIA terms. Morecambe considers that due to limited recreational activity within the Morecambe study area, the impact would similarly be non-significant in EIA terms. On the basis of these cumulative assessments, it is concluded that there is no potential for significant cumulative effects on other marine users and activities to occur, and the AyM CEA conclusion of no significant effect remains valid in light of the recently available information contained within the Mona, Morgan and Morecambe PEIRs.
Military and civil aviation	The AyM CEA study area for aviation and radar was based upon a 40 km study area in relation to aviation obstacle impacts, and a 100 km study area for radar interference impacts. Therefore, there is potential for Mona, Morgan and Morecambe to interact with AyM and result in potential effects cumulatively with AyM. The AyM CEA concluded that a range of mitigation measures including notifications to aviation stakeholders, and appropriate lighting and marking of structures would minimise effects on flight operations. It was therefore concluded that there would be no significant residual cumulative effects. The Mona,

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	Morgan and Morecambe PEIRs all assessed the cumulative impacts of obstacle creation as non-significant in EIA terms on the basis that they would also have appropriate mitigations in place. In terms of radar interference, Mona, Morgan and Morecambe all identified potentially significant effects without mitigation. However, all projects are working towards commercial agreements for mitigation solutions that would reduce these to non-significant levels. It is noted that this was also the case for AyM until the Applicant agreed a radar blanking and infill contract with National Air Traffic Services (NATS) (see NATS withdrawal of objection at REP8-098). Therefore, it is concluded that there is no potential for significant cumulative effects on aviation and radar receptors and the AyM CEA conclusion of no significant effect remains valid in light of the recently available information contained within the Mona, Morgan and Morecambe PEIRs.
Landscape and visual impact assessment	A review of the landscape and visual resource likely to be significantly cumulatively affected by AyM onshore infrastructure alongside the Mona Proposed Onshore Development Area, has been undertaken. Reference has also been made to the Mona PEIR Seascape, landscape and visual resources chapter (hereafter described as the Mona SLVIA) in establishing which landscape and visual receptors may be significantly cumulatively affected by the addition of onshore elements of both AyM and Mona and, therefore, require further consideration and assessment. These have been identified as follows: ▲ Landscape elements and features – agricultural land, hedgerows, taller hedgerows and hedgerow trees, mature trees; ▲ Landscape character receptors - A1. Eastern Lowlands (Cefn Meiriadog Vale Slopes); ▲ National landscape planning designations – The Clwydian Range and Dee Valley AONB; ▲ People using Public Rights of Way (PRoW) in the vicinity of AyM and Tier 1 projects; and ▲ People using the Offa's Dyke Long Distance Route. There are some differences in the approaches taken by the authors of the AyM LVIA and The Mona SLVIA, which is not unusual. In addition, the Mona proposals are at a very early stage and as a result there is limited detail or definitive information available on which to base this consideration (such as optionality in terms of the Mona substation location). With regard to Landscape elements and features – agricultural land, hedgerows, taller hedgerows and hedgerow trees, mature trees', the cumulative effect of both AyM and Mona onshore infrastructure is predicted to be Medium and Significant (in the vicinity of the AyM OnSS and Mona Onshore Substation Option 2 sites and within the intervening area between the two proposed substations, to the south of Glascoed Road) until the tall hedgerows and trees establish as part of the landscape mitigation. This level of effect is the same as, or lower than that predicted for AyM, without the presence of Mona, within the AyM LVIA. There is a similar finding for Landscape character receptors - A1. Eastern Lowlands (Cefn Meiriadog Vale Slopes)' where the potential cumulative effect of both AyM and Mona onshore infrastructure during the early part of the operational period would be Medium and Significant within areas of the LCA located between the AyM OnSS, Mona Onshore Substation Option 2 and the NGS. Once the planting establishes around the AyM and Mona Onshore Substation Medium-low (or lower) and Not-Significant. This level of effect is the same as, or lower than that predicted for AyM, without the presence of Mona, within the AyM LVIA. Although the Mona LVIA predicts a significant cumulative effect on the Clwydian Range and Dee Valley AONB, the onshore effects of AyM, without the presence of Mona, were assessed as having no potential for significant effects from the Viewpoint 9: Y Foel (REP8-081) or the Clwydian Range and Dee Valley AONB. This was due to distance and intervening landscape elements (woodland, trees and St Asaph Business Park), which combine to limit actual visibility of the AyM Onshore ECC and OnSS. This view of non-significant effects is shared by the Clwydian Range and Dee Valley AONB Joint Committee, DCC and NRW

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	who have all confirmed the onshore proposals do not affect the AONB. It is the Mona Onshore Substations and the Elwy Solar Energy Farm that are likely to have a more material cumulative effect due to their closer proximity to the AONB and the larger scale of their development parameters and it is these developments that account for the significant cumulative effects reported within the Mona LVIA. The Mona LVIA predicts a significant cumulative effect on users of PRoW as a result of Mona, AyM and other developments. The AyM LVIA states that the AyM OnSS would have localised significant effects on one section of the PRoW network, the bridleway to the south of Faenol-Bropor during operation of the OnSS. The Mona Onshore Development and the Elwy Solar Energy Farm may also affect views from sections of PRoW. Their effects will be more widespread during the cable route construction phase of Mona compared with the operational phases. It is unlikely that there will be a high degree of sequential visibility of the Mona development and AyM onshore construction and operational parts of the onshore project due to the lack of continuity and readily walkable links between the PRoW in the area where the two projects are near to each other. The only section of PRoW where a significant cumulative effect has been identified is a short (<0.5 km) section of the Bridleway to the north of AyM OnSS through glimpsed sequential visibility that may also include views of Mona Onshore Substation Option 2 resulting in a medium cumulative magnitude of change. This level of effect is the same as that predicted for AyM, without the presence of Mona, within the AyM LVIA. The Mona LVIA predicts a significant cumulative effect on users of the Offa's Dyke National Park Trail as a result of Mona, AyM and other developments. The closest section of the Offa's Dyke Long Distance Route (LDR) runs through the Clwydian Range and Dee Valley AONB. The onshore effects of AyM, without the presence of Mona, on the AONB were assessed in Table 12 of the AyM LVIA where it was considered that there is no potential for significant effects from the Viewpoint 9: Y Foel (REP8-081) or the AONB due to distance and intervening landscape elements (woodland, trees and St Asaph Business Park), which combine to limit actual visibility of the Onshore ECC and OnSS. This view of non-significant effects is shared by the Clwydian Range and Dee Valley AONB Joint Committee, DCC and NRW. Due to the intervening features, separating distance and form of the AyM onshore development proposed it is considered that the AyM OnSS and ECC would make only a very limited contribution to the cumulative effects on views from the Offa's Dyke LDR. It is the Mona Onshore Substations (primarily the closer range Option 7) and the Elwy Solar Energy Farm that are likely to have a more material cumulative effect due to their closer proximity to the LDR and the larger scale of their development parameters (both vertical and horizontal in the case of the Mona Onshore Substations
Socio-economics	The assessment of impacts upon construction employment for AyM predicts a minor beneficial cumulative impact for both North Wales and Wales that is not significant in EIA terms. The PEIR assessment for Mona predicts a significant beneficial effect on employment during the construction phase, however this is based on different criteria for assessing magnitude of impact to that used for AyM. Using the AyM methodology, the cumulative impact of AyM and Mona construction on employment would remain not significant in EIA terms. The construction of both Mona and AyM could create economic value through supply chain expenditure in North Wales. Similar to employment effects, this is very unlikely to be a significant cumulative effect when following the assessment methodology for AyM The construction of both Mona and AyM could lead to a temporary influx of workers that would increase demand for healthcare services in North Wales. However, the scale of employment does not represent a significant effect on the North Wales economy when following the assessment methodology used in the assessment of employment effects of AyM and therefore this impact would remain not significant in EIA terms. Depending on the location of the operations and maintenance (O&M) port, both Mona and AyM could generate economic value in North Wales through supply chain expenditure. For the same reasons as the employment impact of operations, this impact is likely to be negligible and the impact would remain not significant in EIA terms.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
Tourism and recreation	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to onshore or offshore recreation. Although there will be some overlap in the Order Limits and Local Area of Influence for onshore infrastructure for Mona and AyM, there is only limited risk of cumulative impacts on onshore recreation given the relatively small area where this overlap would occur. The inclusion of measures to mitigate impacts upon public rights of way (PRoW) users for both projects (for AyM a Public Access Management Plan and for Mona a PRoW Management Strategy) will ensure any effects can be reduced to a level that is not significant in EIA terms. The study area for offshore recreation in the ES socio-economic assessment of AyM was focused on a local area of influence within 500 m of onshore infrastructure. Given the distance between the landfall for AyM and Mona, there is no overlap in the local areas of influence and therefore no risk of cumulative effects and the impact would therefore remain not significant in EIA terms. With regards to tourism receptors, the limited spatial overlap between the two projects means that there is only one potential tourism receptor that could be affected by both projects which is Bodelwyddan Park. The study area for tourism receptors in the ES for AyM was focused on a local area of influence (LAI) within 500 m of onshore infrastructure. Although Bodelwyddan Park falls within this area the castle and grounds immediately around the castle are outside of the AyM LAI. The parkland does extend into this area, however there is no evidence that this is currently used by the public in any significant numbers. The parkland is largely shielded by woodland and tree belt on its eastern border. This remains the case for the onshore infrastructure proposals for both AyM and Mona projects and so the findings of the AyM Tourism and Recreation remain unchanged, and the impact remains not significant in EIA terms. Neither the AyM nor the Mona CEA identify any significant adverse effects relating to tourism. Although offshore infrastructure associated with both Mona and AyM would be visible from the North Wales coast once operational, there are no significant visual effects predicted for the Mona infrastructure given the increased distance of the array from the coastline. Given the limited potential for visual effects identified for offshore infrastructure associated with the Mona scheme, the findings of the AyM Tourism and Recreation CEA relating to the volume and value of the tourism economy during both construction and operational phases remain unchanged.
Biodiversity and nature conservation	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to onshore biodiversity and nature conservation. Both AyM and the Mona project seek to minimize habitat loss through sensitive routing and siting with both projects including proposals for replanting hedgerows and for habitat restoration and creation resulting in effects that are not significant in EIA terms. When considered together, the proposals for habitat restoration and creation means that there are not considered to be significant cumulative effects. Protected species surveys are ongoing for the Mona Project and so survey results have not been provided within the PEIR. Therefore, there is insufficient information available to undertake a meaningful consideration of the cumulative effects on protected or notable species. Both projects include proposals for replanting hedgerows and for habitat restoration and creation in order to mitigate habitat fragmentation such that effects are not significant in EIA terms. Both AyM and Mona propose measures to control the spread of INNS during construction and so the potential effect is not considered to be significant in EIA terms. Given the limited spatial overlap of the two projects and with the incorporation of appropriate construction mitigation techniques that would be included within respective CoCPs to prevent the release of pollution and sedimentation, the cumulative impact remains not significant in EIA terms.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
Ground conditions and land use	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to ground conditions and land use. Whilst there is predicted to be a temporary impact upon agricultural land during the construction phase of both projects, the reinstatement of land above buried cables will allow agricultural cultivation to re-commence once the cable has been installed. Field drainage will be reinstated and the indicative minimum burial depth (from ground surface to the top of the cable ducting), will allow cultivation of land. As such, there are not predicted to be significant effects arising from the temporary works. With regards to the OnSS, an Agricultural Land Classification (ALC) survey was undertaken during DCO Examination of the AyM application (REP7-036). The survey has confirmed that there is no ALC grade 3a land within the OnSS footprint and within the wider OnSS mitigation area, ALC grade 3a land is limited to a 1 Ha area. Therefore, the permanent loss of Best and Most Versatile (BMV) agricultural land as a result of AyM is limited to 1 Ha and is not considered to be significant in EIA terms. The permanent loss of BMV land resulting from the Mona scheme is reported as 7.1 Ha of Grade 3a land and is not considered significant in EIA terms. The cumulative effect of both AyM and Mona would be the permanent loss of 8.1 Ha of BMV and the increase of 1 Ha is not considered significant in EIA terms.
Hydrology, hydrogeology and flood risk	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to hydrology and flood risk. Given the limited spatial overlap of the two projects and with the incorporation of appropriate construction mitigation techniques that would be included within respective CoCPs to protect surface water and groundwater from potential pollution and sedimentation, the cumulative impact is predicted to be of local spatial extent, short term duration, of intermittent occurrence and reversible and not significant in EIA terms. With regard to flood risk, measures to control and manage surface water during construction and operation of both projects mean that the cumulative effect on flood risk is not predicted to be significant. Construction methodologies will be implemented for temporary works for the Mona project to ensure the risk of flooding is not increased (e.g. use of permeable gravel overlying a permeable geotextile membrane of an appropriate standard for construction compounds, haul road and construction accesses and drainage features to maintain land drainage flow). For AyM, a surface water management plan would be developed and approved as part of the CoCP. Similarly, the Mona OnSS would be designed to ensure no increase in the greenfield rate of runoff and a surface and a foul water drainage scheme would be developed and approved under a DCO Requirement for the AyM substation.
Onshore archaeology and cultural heritage	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to direct effects on historic assets or for indirect effects on setting. The majority of both onshore cable corridors are distinct and with minimal potential for overlap, and hence there is only limited potential that the same archaeological assets or asset groups will be cumulatively affected. The one area where there is a correlation of routes (land south of Glascoed Road which AyM has assessed with respect to the AyM national grid connection) is a very small part of the overall Mona route, where the potential for effects on the same archaeological resources would be, at most, only slight. It is considered that the effect to be no more than a "minor" cumulative effect (not significant for EIA purposes) for which mitigation is available. AyM and Mona will have some heritage assets in common which may potentially share intervisibility with the AyM OnSS and the Mona Option 2 substation. AyM reported minor adverse effects to Faenol Bropor and Bodelwyddan Castle as a result of the presence of the OnSS during the operational phase. The addition of the Mona substation is not expected to result in a significant cumulative effect to either of these assets given the increased distance and limited intervisibility from these features. It is noted that at this stage, the Mona assessment does not include an asset-by-asset assessment of the predicted impacts upon the setting of individual heritage features.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	The Mona PEIR heritage chapter does not include an assessment of the effects of the offshore array on onshore heritage assets through change within their setting. However, the Seascape, Landscape and Visual Impact Assessment does consider World Heritage Sites (WHS) (Beaumaris and the North Wales Slate Mining Landscape WHS (northern components) specifically, albeit in landscape terms. Given the distance of the Mona array from the assets (minimum of 35 km) there is not considered to be a potential effect for a significant cumulative impact as a result of the presence of the two projects cumulatively given the greater distance of the Mona array from the onshore heritage assets.
Traffic and transport	The AyM CEA does not identify any significant adverse effects relating to traffic and transport. The Mona PEIR does not include a cumulative assessment and the PEIR confirms that this will be provided in the DCO application environmental statement. Consideration has been given to the potential for increases in construction traffic upon driver severance and delay, community severance and road safety and vulnerable users for a scenario where the AyM and Mona construction periods overlap. Although an increase in construction traffic would mean the cumulative magnitude of impact would increase, in comparison to that assessed in the AyM Traffic and Transport assessment, in all cases the resulting level of effect would be at most minor, and so not be significant in terms of EIA Regulations.
Noise and vibration	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to noise and vibration during the operational or construction phases of either project. Although there is a limited degree of spatial overlap and potential for both projects to undertake onshore construction activities at the same time, the implementation of construction noise mitigation for both projects through respective CoCPs is not predicted to result in significant cumulative construction effects. Given the minimum distance between the AyM and Mona (Option 2) substations is at least 900 m, and the control of potential operational noise through set noise limits at nearby representative receptors for AyM and proposals for an Operational Noise Management Plan for Mona, there are not predicted to be any significant noise effects resulting from operation of the two substations. Although the assessment of offshore piling noise within the Mona PEIR utilises a different methodology to AyM, the Mona array is of sufficient distance from onshore noise sensitive receptors that there would be no increase or change predicted likely significant effect when the cumulative impacts of both projects are considered.
Air quality	Neither the AyM nor the Mona CEA identify any significant adverse effects relating to air quality (dust). As is the case for noise impacts, there is a limited degree of spatial overlap and potential for both projects to undertake onshore construction activities at the same time. Although, there is potential for cumulative effects to occur during construction in areas that are close to or overlap the AyM Order limits, the implementation of suitable primary and tertiary mitigation for both projects will ensure that cumulative effects arising during construction are not significant.
Public health	Public health is an inherent part of a number of technical areas assessed within the ES, including flood risk, air quality, noise and vibration and traffic and transport. The potential cumulative health impacts assessed for these regarding the AyM and Mona projects, are not predicted to give rise to significant cumulative effects as set out in the rows above. With regard to Electromagnetic fields, although the Mona PEIR provides only an indicative 100 m cable corridor, spatial overlaps in cable corridor for the two projects in proximity to places where people spend extended periods of time are not expected. The substations for both projects are sufficiently far apart that any cumulative impacts as a result of substation Electromagnetic fields will not occur.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
	Given both projects will place cables underground and there are no residential properties located within the cable corridors of either project, it is considered that cumulative effects arising from Electromagnetic fields of both projects are not significant.
Habitats Regulations Assessment (HRA)	

The Report to Inform Appropriate Assessment (RIAA) for AyM (REP8-055) concluded that AyM would not result in any Adverse Effect on Integrity (AEoI) on the conservation objectives of any site designated as part of the UK National Site Network, either alone or in-combination with other plans, projects and activities.

Mona and Morgan both considered AyM within their in-combination assessments and did not definitively identify any AEoI on the basis of the preliminary assessments provided in their draft RIAAs. However, it is noted that in the case of the Lleyn Peninsula and the Sarnau SAC (designated for harbour porpoise) and the Cardigan Bay SAC (designated for bottlenose dolphin), it was only considered unlikely that there would be AEoI, and that further work prior to Mona and Morgan applications would need to be done to assess population-level effects, before being able to conclude this beyond reasonable scientific doubt. Therefore, Mona and Morgan were not able to rule out AEoI for this site.

Additionally, in relation to the Liverpool Bay SPA, Mona and Morgan could not exclude the possibility of AEoI (either alone or in-combination), because the assessment of No AEoI had been made with reference to previous Conservation Objectives for the site that have since been superseded by more recent advice published in 2022. Mona and Morgan highlight that the updated Conservation Objectives will be reviewed prior to application and an assessment against the updated conservation advice would be done at that stage to determine the assessment conclusion. It is noted that during the AyM Examination, the updated Conservation Objectives for this site were raised, and both the Applicant and NRW confirmed that the conclusion of No AEoI remained valid in light of the updated Conservation Objectives (see NRW's response to ExQ3.2.14 in REP7-056). It is expected that this would similarly apply to Mona and Morgan.

Morecambe also considered AyM in its in-combination assessment and did not definitively identify any AEoI on the basis of the preliminary assessments undertaken in the Morecambe draft RIAA. However, with respect to the Morecambe Bay and Duddon Estuary SPA and Ramsar, Morecambe stated that it was possible that AEoI could occur when considering the project- in combination with other plans or projects. However, it was also stated that this assessment would be revisited prior to application once a full suite of aerial survey data was available for the project, and additional information about nearby wind farms was available.

Furthermore, for the following sites, Morecambe did not definitively identify AEoI, but stated that the assessments for these sites would be revisited prior to application with the availability of further information:

- Ribble and Alt Estuaries SPA and Ramsar;
- North Anglesey Marine SAC (harbour porpoise);
- North Channel SAC (harbour porpoise);
- West Wales Marine SAC (harbour porpoise);
- Rockabill to Dalkey Island SAC (harbour porpoise); and
- Strangford Lough SAC (harbour seal).

Whilst Mona, Morgan and Morecambe have concluded that AEoI cannot be ruled out for the sites and features described above, these conclusions have only been made on the basis of preliminary assessments for the purpose of consultation. Further assessment and/or project refinement is expected to be undertaken for the Mona, Morgan and Morecambe projects which will be reflected in the submitted DCO applications, along with any necessary measures to ensure there is no AEoI, in consultation with the relevant statutory consultees. Therefore, until such further assessment has been completed at the application stages for those projects, the Applicant considers that the AyM conclusion of No AEoI in-combination remains valid.

TOPIC	POTENTIAL FOR CUMULATIVE EFFECTS
Water Framework Directive (WFD) compliance assessment	
The AyM WFD compliance assessment concluded that AyM was compliant with the objectives of the WFD and will not result in deterioration in status of any coastal or transitional waterbodies, associated protected areas, either when considered alone or in-combination with other projects, plans and activities. Morgan and Morecambe are considered to be sufficiently distant from AyM such that there is no potential for in-combination effects on WFD waterbodies. The Mona array is located 12.2 km from AyM at its closest point and is therefore unlikely to contribute to any in-combination effect due to the limited spatial extent of effects, and the infrequent nature of the activities that would result in such effects. The Mona offshore ECC however, is located 3.6 km from AyM at its closest point and therefore there is potential for construction activities in this area to interact cumulatively with AyM. Mona undertook a WFD compliance assessment and considered the same coastal and transitional waterbodies as AyM (namely the North Wales Coastal Waterbody and the Clwyd Transitional Waterbody). Both AyM and Mona concluded that there was no potential for deterioration in status of these waterbodies. Therefore, the conclusions of AyM's WFD compliance assessment in-combination remain unchanged and AyM remains compliant with the objectives of WFD, not resulting in the deterioration in status of any relevant WFD waterbodies or associated protected areas in-combination with other plans, projects or activities.	

3 Conclusions

31 On 19 April 2023, PEIRs were published for formal consultation by the promotors of the Mona, Morgan and Morecambe offshore wind projects. The Applicant has undertaken a review of the information presented in these PEIRs against the conclusions of the AyM CEA in order to identify the potential for additional likely significant effects (LSE). A summary of the conclusions of this review is contained within Table 1, with further detail and supporting evidence provided in Table 2. For the majority of topics, the Applicant has concluded that there is no potential for additional cumulative LSE, and that therefore the conclusions of the AyM CEA are unchanged.

32 The Applicant cannot rule out the potential for additional cumulative effects on marine mammals, however it is expected that further assessment work (including consideration of mitigation and consultation with the relevant stakeholders) will be undertaken at the ES stage by Mona, Morgan and Morecambe and suitable commitments will be provided to ensure that significant cumulative effects do not arise.

33 The Applicant also cannot rule out the potential for additional cumulative effects on seascape, landscape and visual receptors, however the only potential for significant effects is in relation to the Mona project and the Isle of Anglesey (IoA) AoNB. This is, however, a highly precautionary approach and even if such effects were to arise, they would not affect any special qualities of the AoNB that are unaffected by AyM alone or alter the Applicant's overall conclusions regarding the impact of AyM on the IoA AoNB. In addition, such effects will be given appropriate consideration by Mona in its ES as it progresses to the DCO application and examination phases, including consideration of further mitigation (if necessary) and consultation with statutory consultees.

34 In HRA terms, Mona, Morgan and Morecambe have not ruled out the potential for AEoI in-combination based on the preliminary assessments undertaken for the purposes of consultation in their respective draft RIAAs. It is expected that further assessment will be undertaken for those projects in the final RIAAs that will accompany their applications, along with any necessary measures secured to ensure no AEoI.

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Contents

1 Introduction

1.1 Purpose of this document

1 The statutory framework for determining applications for Development Consent for Nationally Significant Infrastructure Projects (NSIPs) such as Awel y Môr Offshore Wind Farm (AyM) is provided by the Planning Act (PA) 2008. Section 104 of the PA 2008 confirms the matters the Secretary of State (SoS) must have regard to in decision making where a national policy statement (NPS) has effect, such as for AyM.

2 In deciding the application for Development Consent for AyM, the relevant NPSs to which the SoS must have regard in accordance with Sections 104(2) and 104(3) of the PA 2008, are:

- Overarching National Policy Statement for Energy EN-1 (NPS EN-1) which sets out the Government's policy for the delivery of and the position in relation to the need for new Energy NSIPs, and the assessment principles and consideration of generic impacts in relation to such projects;
- National Policy Statement for Renewable Energy Infrastructure EN3 (NPS EN-3) which covers technology specific matters including offshore wind; and
- National Policy Statement for Electricity Networks Infrastructure EN5 (NPS EN-5) which covers technology specific matters but mostly relates to the provision of overhead lines and as such, is of limited relevance as no new overhead lines are proposed as part of the AyM application.

3 Awel y Môr Offshore Wind Farm Limited (the Applicant) has provided information on AyM's accordance with the NPSs (as well as other relevant plans and policies) in its Planning Statement (REP8-083) and other application documents as set out in Sections 1.2 and 1.3 below. However, the Applicant recognises the potential usefulness of an NPS tracker to assist the Examining Authority (ExA) in making its recommendation, and the SoS in making its determination on the application.

4 The Applicant has previously provided a NPS tracker (REP8-032) for the extant NPSs and a draft NPS tracker for the 2021 draft NPSs (REP8-030).

5 In considering the relevance of the 2023 revised draft NPS to the determination of the AyM application it is important to have regard to Section 1.6 of draft EN-1 (transitional provisions following review) which states at paragraphs 1.6.2 and 1.6.3:

"The Secretary of State has decided that for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS.

The 2023 amendments will therefore have effect only in relation to those applications for development consent accepted for examination, after the designation of those amendments. However, any emerging draft NPSs (or those designated but not yet having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application."

6 The paragraphs above make it clear that:

- As AyM was accepted for examination before the designation of any Energy NPS amendments, the 2011 extant NPS are the relevant policy against which the application should be determined in accordance with s104 of the Planning Act 2008; and
- The extent to which the 2023 Energy NPS amendments, or any further amendments are relevant must depend on the Applicant's ability to comply with the relevant policies having regard to the fact that, as noted in paragraph 1.6.2, the AyM application was prepared and has been examined prior to the designation of any amendments to the Energy NPS.

1.2 The Planning Statement

7 The Applicant submitted a Planning Statement (REP8-083) as part of the AyM application to provide an overview of the scheme's compliance with relevant policy and to assist the ExA and SoS in their reviews of the application in the context of relevant planning policy.

8 The Planning Statement (REP8-083) sets out the need for the scheme in the context of the NPSs, as well as a planning assessment considering the relationship between AyM and the relevant NPS policies. An update to the relevant energy and climate change policy is set out in Appendix A of the draft NPS tracker submitted at Deadline 8 (REP8-030) and should be read alongside the Planning Statement.

9 For the reasons set out in the Planning Statement conclusions and executive summary, the Planning Statement concluded that the SoS can conclude that the proposed AyM project would bring significant benefits under a range of national, international and local policy considerations, would be in accordance with relevant NPSs and legislation, and:

- Would not lead to the UK being in breach of any of its international obligations;
- Can be satisfied that the benefits of AyM outweigh any adverse impacts;
- That there is no condition prescribed for deciding the application otherwise than in accordance with the relevant extant NPSs; and
- That under the terms of S.104 of the PA 2008, the development should therefore be consented.

10 To assist the Secretary of State in determining the weight to be attached in accordance with section 1.6 of the revised draft EN-1, the Planning Statement (REP8-083) and the draft NPS tracker document identify where the key draft 2023 NPS tests have been met. Furthermore, the individual topic chapters provide a record of all draft 2021 NPS provisions that differ from the extant NPS, and how the project has accorded with them, noting that the final revised NPS provisions may differ from the drafts.

1.3 The Environmental Statement

11 The Applicant has provided a full Environmental Impact Assessment (EIA), reported in the Environmental Statement (ES) that accompanied the application, which includes information on the relationship between AyM and the topic-specific planning policies outlined in the NPS(s).

12 As part of the EIA process, the scope of assessment work was undertaken in line with the NPS(s) to ensure that topic specific policy tests were met, and the proposed project (AyM) was therefore in accordance with the relevant paragraphs of the relevant NPS(s). As set out in the Policy and Legislation chapter of the ES (APP-040), relevant issues in NPS EN-1, EN-3 and EN-5 were identified and assessed in detail within the policy sections of the topic-specific onshore and offshore ES chapters (APP-048 to APP-060, and APP-063 to APP-073 respectively).

13 Further detail on the need for the project, the site selection process and the iterative design process in the context of the NPS(s) has also been provided in the Site Selection and Alternatives chapter of the ES (APP-044). Alongside the demonstrated accordance with the NPS(s) with regards the need for renewable energy, the ES and Planning Statement noted in particular that AyM will also meet the well-being goals set out in the Well-being of Future Generations Act (2015), not least in terms of Goal 1, A Prosperous Wales, in creating "*an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.*" (Section 4 of the Well-Being of Future Generations Act 2015).

2 NPS Accordance Tables

14 This document has been prepared for the SoS as a result of the publication of the revised draft NPSs on 30 March 2023, after the close of the AyM examination. The Applicant has reviewed the changes made to the draft NPSs and has selected and commented on what it believes to be the material changes relevant to the project in the accordance tables below.

15 This document should be read alongside the NPS tracker (REP8-032) and the draft NPS tracker (REP8-030) submitted at Deadline 8 which presents the Applicant's comment on any NPS paragraphs that have not materially changed and are therefore not listed in the table below.

16 The NPS accordance tables below provide the relevant elements of NPS EN-1, EN-3 and EN-5 and demonstrates the AyM application's accordance with them.

17 The following colour coding has been used within the tables below to show how the revised draft NPS paragraphs differ to the existing extant NPS paragraphs:

- White cells – No change to policy wording except paragraph numbering;
- Green cells – Amendments to the wording of existing policies which are highlighted as red underlined text; and
- Purple cells – New policy provisions of the draft NPS.

2.1 EN-1 NPS Accordance Table

Table 1: NPS EN-1 accordance.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
EN1 Part 3: The need for new nationally significant energy infrastructure projects			
Secretary of State decision making	Draft EN-1 3.2.5	The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.	As noted in response to the draft NPS provisions made at paragraph 3.2.1 and 3.2.2 (REP8-030), the proposed development is in accordance with the extant and draft NPS with regards the contribution made to UK renewable energy targets and therefore the established need for the AyM project and substantial weight that the Secretary of State may place on this need. The need for the project is further set out in the Statement of Reasons (REP8-019). The proposed AyM project meets need in the UK for the types of energy infrastructure covered by EN-1 and contributes significantly towards the Welsh and UK's current cumulative electricity supply deployment target for 2030, enough for approximately 500,000 households, necessary in order to achieve energy security at the same time as reducing greenhouse gas emissions. Further to this, AyM would contribute to the delivery of the 30 GW of renewable energy envisaged in both the extant and draft NPS EN1 and the ambition to deliver 40 GW of offshore wind by 2030 as set out in the UK Government's 2021 announcement; a figure which as noted within the Planning Statement (REP8-083) was revised upward to 50 GW by 2030 in the April 2022 UK Government Energy Security Statement. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 3.2.6	In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	
	Draft EN-1 3.2.7	The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.	
	Draft EN-1 3.2.9	Other novel technologies or processes may emerge during the life of this NPS, and can help deliver our energy objectives. Where these contribute towards the objectives set out in paragraph 3.2.1, the Secretary of State should determine that there is a need for such technologies and that substantial weight should be given to this need.	
The need for new nationally significant electricity infrastructure	Draft EN-1 3.3.13	The Net Zero Strategy[35] sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target. This made clear the commitment that the cost of the transition to net zero should be fair and affordable. 35 - See https://www.gov.uk/government/publications/net-zero-strategy	As noted in response to the draft NPS provisions made at paragraph 3.2.1 and 3.2.2 (REP8-030), the proposed development is in accordance with the extant and draft NPS with regards the contribution made to UK renewable energy targets and therefore the established need for the AyM project and substantial weight that the Secretary of State may place on this need. The need for the project is further set out in the Statement of Reasons (REP8-019). In terms of AyM's contribution to reducing greenhouse gas emissions, reference is made to the Lifecycle Assessment at REP5-006. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 3.3.15	Based on our whole-system modelling, by 2050, emissions associated with power could need to drop by 95-98 per cent compared to 2019, down to 1-3 MtCO2e. In the interim, to meet our NDC and CB6 targets, we expect emissions could fall by 70-75 per cent by 2030 and 80-85 per cent by 2035, compared to 2019 levels. These figures are based on an indicative power sector pathway contributing to the whole economy net zero and interim targets.[36]	

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
		36 - 3i. Power of the Net Zero Strategy: Charts and Tables See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1066450/nzscharts-tables-v1.1.xlsx .	
	Draft EN-1 3.3.16	If demand doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Net Zero Strategy[37] to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon. 37 - See https://www.gov.uk/government/publications/net-zero-strategy	
	Draft EN-1 3.3.21	As part of delivering this, UK government announced in the British Energy Security Strategy[39] an ambition to deliver up to 50GW of offshore wind by 2030, including up to 5GW of floating wind, and the requirement in the Energy White Paper[40] for sustained growth in the capacity of onshore wind[41] and solar in the next decade.[42] 39 – See https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-securitystrategy 40 – See https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future 41 – Applications for onshore wind should be considered by the relevant local planning authority. 42 - This is a UK government ambition with the Welsh and Scottish Government's having set their own internal ambitions. See https://gov.wales/sites/default/files/publications/2019-07/future-potential-for-offshore-wind.pdf and See https://www.gov.scot/publications/offshore-wind-policy-statement/	
	Draft EN-1 3.3.59	Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant new offshore wind infrastructure (and supporting onshore and offshore network infrastructure).	AyM is nationally significant offshore wind infrastructure and as such, its development would assist the government in achieving the stated CNP. As noted in the Planning Statement (REP8-083), AyM is anticipated to provide clean electricity for up to 500,000 homes, and make a substantial contribution to meeting the UK and Wales' renewable energy targets. It is acknowledged that there are unavoidable (but reversible) significant seascape and landscape effects predicted (REP8-082). A landscape enhancement scheme, secured by Requirement 26 of the dDCO (REP8-118) has been agreed with the North Wales local planning authorities and NRW. This provides a significant fund to be used to enhance landscapes within the Isle of Anglesey AONB, Great Orme Heritage Coast and Eryri National Park. There are also anticipated to be potentially significant, temporary adverse impacts on hedgerows and coastal dune invertebrates at a
	Draft EN-1 3.3.60	As set out in EN-3, subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	

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			county level in the short term until the proposed mitigation is sufficiently mature and has become established. However, all predicted significant effects have been mitigated as far as practicable and, when taken as a whole, there are no adverse effects, individually or cumulatively, that would be sufficient to outweigh the substantial benefits of, and urgent need for new offshore wind capacity as CNP. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 3.3.79	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6.[60] According to the Net Zero Strategy[61] this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand. 60 – https://www.gov.uk/guidance/carbon-budgets#setting-of-the-sixth-carbon-budget-2033-2037 61 - See https://www.gov.uk/government/publications/net-zero-strategy	As noted in Section 4.3 of the NPS tracker (REP8-032), the proposed AyM development can make a large, meaningful and timely contribution to decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, thereby addressing important aspects of the UK's legal obligations and Government policy. It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport. Decisions through the consenting system must be responsive to this changed position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated within Section 4.3 of the NPS tracker (REP8-032), in the planning balance. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 3.3.80	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy	
EN1 Part 4: Assessment Principles			
General Policies and Considerations	Draft EN-1 4.1.2	The Energy White Paper[88] and British Energy Security Strategy[89] emphasises the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. The Levelling Up White Paper[90] calls on the Government to ensure investment in the transition to Net Zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development and the creation of jobs. 88 – See https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future 89 – See https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-securitystrategy 90 - See https://www.gov.uk/government/publications/levelling-up-the-united-kingdom	As noted in the Planning Statement (REP8-083), AyM is anticipated to provide clean electricity for up to 500,000 homes, and make a substantial contribution to meeting the UK and Wales' renewable energy targets. Furthermore, the project is expected to bring positive benefits in terms of contributions to the local and regional economy, supporting skills and employment. The Applicant has also prepared an outline Skills and Employment Strategy (REP4-007) that is secured through the DCO. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 4.1.8	Where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land.	The AyM order land includes areas for ecological and environmental mitigation works, habitat creation or enhancement for protected species translocation and biodiversity benefit/gain. These works are proposed on existing agricultural land, verges and hedgerows alongside and in proximity to the cable corridor and access routes and land which has existing ponds and woodland. The requirement for compulsory purchase of land required for AyM is detailed within the Statement of Reasons (REP8-019). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.1.9	The Secretary of State will consider any such application under the usual compulsory acquisition principles, taking into account the content of the NPSs.	
	Draft EN-1 4.1.19	Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. [95] 95 - Planning Act 2008: guidance on the Pre-application process available at: See https://www.gov.uk/government/publications/guidance-on-the-pre-application-process-for-major-infrastructureprojects	The Applicant can confirm that consultation on both the site selection process (see the Site Selection and Alternatives Chapter (APP-044)) and the evidence base for the assessment (see evidence plan) has been undertaken throughout the evolution of the proposed development. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.1.20	This is particularly so in the case of HRA matters covered in paragraphs 5.4.25 to 5.4.31 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State.	
Environmental Principles	Draft EN-1 4.2.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.[98] 98 - See https://www.gov.uk/guidance/environmental-impact-assessment	The Applicant undertook an EIA scoping process to identify the potential impacts which were agreed with the Secretary of State through the scoping opinion and have been subsequently assessed in the topic specific chapters (Volume 2 and 3 of the ES). A comprehensive and proportionate assessment of the potential impacts is presented within the ES. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.2.18	The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some	As noted in the EIA Methodology ES chapter (REP8-056) and topic-specific chapters, the EIA, in line with PINS Advice Note Nine: Rochdale Envelope, is based on identifying the Maximum Design Scenario (MDS)

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		flexibility in the consent to account for uncertainties in specific project details.	for each impact assessed. This approach ensures that the scenario that would result in the greatest impact (e.g., largest footprint, longest exposure, or largest dimensions) is considered. Unless identified in the ES, it can be assumed that any other (lesser) scenario for that impact would result in no greater significance than that assessed in the EIA. The design information for AyM is based on the best available information and the parameters outlined in the project description chapters are realistic and considered estimations of future design parameters. Therefore, each chapter will assess the 'realistic worst-case' scenario for each of the identified potential impacts. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.2.20	In addition, in exercising functions in relation to Wales, the Secretary of State should consider Section 6 of the Environment (Wales) Act 2016 and seek to maintain and enhance biodiversity, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of the Secretary of State's functions.	Proposals to provide biodiversity enhancement were discussed with NRW and DCC through the Onshore Ecology Expert Topic Group (ETG) process. These proposals, which were agreed in principle with ETG members, are presented within the Outline Landscape and Ecology Mitigation plan (oLEMP) (REP7-026). The oLEMP sets out the in-principle measures which will be implemented to avoid, reduce, mitigate or compensate for potential impacts on landscape and biodiversity resources and measures intended to provide biodiversity enhancements due to the onshore elements of AyM. The oLEMP sets out the key elements that will be secured in the final Landscape and Ecology Mitigation Plan (LEMP) which will be agreed with DCC, in consultation with NRW prior to any construction works commencing. These proposals also seek to address the requirement to promote the resilience of ecosystems. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.2.29	Through the Environment Act 2021 the Government has set 13 legally binding targets for England covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. The Secretary of State must consider duties under the Environment Act 2021 in relation to environmental targets and have regard to the policies set out in the Government's Environmental Improvement Plan for improving the natural environment.	
Marine Considerations	Draft EN-1 4.4.3	The cross-government Marine Spatial Prioritisation Programme will review how marine plans and the wider planning regime, legislation and guidance may need to evolve to ensure a more holistic approach to the use of the seas is taken and to maximise co-location possibilities.	Section 4.5 of the Planning Statement (REP8-083) sets out compliance with marine policy, including the Marine Policy Statement (MPS) and the Welsh National Marine Plan (WNMP). As there is no demonstrable conflict between the MPS, WNMP and AyM, there is similarly no conflict with the NPS and as such it is therefore considered that AyM is in accordance with paragraph 4.1.6 of the extant EN-1.
	Draft EN-1 4.4.4	In Wales, the Welsh National Marine Plan[102] sets out Welsh Ministers' expectations that nationally significant infrastructure projects contribute to the well-being of Welsh communities and the sustainable management of natural resources and should seek to	

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		deliver lasting legacy benefits for the local community, the economy and the environment.	The Applicant has considered the relevant Welsh Marine Plan throughout the application, for all offshore components of the proposed development within the relevant marine area. As such, and notwithstanding the prevailing extant NPS with which the application is in accordance, the application is in accordance with this initial draft NPS provision, insofar as the drafting remains as currently drafted.
	Draft EN-1 4.4.5	Defra are producing guidance to help applicants and regulators understand how to use the mitigation hierarchy for environmental impacts on Marine Protected Areas (MPAs), including strategic approaches.103	
	Draft EN-1 4.4.6	Applications for energy infrastructure that falls outside the scope of the Planning Act 2008 or the Electricity Act 1989 may require a marine licence. A deemed marine licence can also be granted as part of the DCO and is developed in consultation with regulators and statutory advisors. A Marine Licence is primarily concerned with the need to protect the environment and human health and to prevent interference with other legitimate uses of the sea. Marine Licences may be required for the marine elements of proposed developments (up to Mean High Water Springs), including associated development and activity such as cabling, dredging and offshore substations. Further information on marine licencing is provided in section 1.2 and 4.11.11 of this NPS and section 2.3.16 to 2.3.22 of EN-3.	
	Draft EN-1 4.4.7	Applicants are encouraged to approach the marine licensing regulator (MMO in England and Natural Resources Wales in Wales) in pre-application, to ensure that they are aware of any needs for additional marine licenses alongside their DCO application.	
	Draft EN-1 4.4.8	Applicants for a development consent order must take account of any relevant Marine Plans and are expected to complete a Marine Plan assessment as part of their project development, using this information to support an application for development consent.	
Environmental and Biodiversity Net Gain	Draft EN-1 4.5.3	Currently environmental net gain only applies to terrestrial and intertidal components of projects. Principles for Marine Net Gain are currently in development by Defra who will provide guidance in due course. There are provisions in the Environment Act 2021 to allow marine net gain to be made mandatory in the future.[105] 105 - See https://www.legislation.gov.uk/ukpga/2021/30/enacted	The Applicant has been involved in and is following closely the recent Marine Net Gain Principles consultation administered by DEFRA. As noted in the Applicant's comments on opportunities for offshore environmental net gain (REP8-036), the Applicant is committed to engaging positively with this concept as it becomes stipulated in policy, and guidance is made available. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 4.5.7	In Wales, applicants should consider the guidance set out in Section 6.4 of Planning Policy Wales and the relevant policies in the Wales National Marine Plan[107]. 107 - See https://gov.wales/welsh-national-marine-plan	As noted in REP8-036, the Applicant recognises that protecting, restoring and enhancing the marine environment are among the key themes of the Welsh National Marine Plan (WNMP), with regard to the resilience of marine ecosystems. The Applicant has engaged with NRW on AyM from an early stage, and has not been guided or directed by NRW to consider net benefits for biodiversity in the marine environment in its statutory advisory role in either the DCO or Marine Licence applications. NRW has also made its position clear in responses to ExA questions on the matter. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.5.9	Biodiversity net gain can be delivered onsite or wholly or partially off-site. Any off-site delivery of biodiversity net gain should also be set out within the application for development consent.	A number of biodiversity enhancements, relevant to the effects of AyM, will be provided as part of the project in accordance with relevant planning policy. A number of the mitigation and compensation measures will result in an overall gain for biodiversity, depending on the details of the final proposals, e.g. where reinstatement leads to the establishment of more diverse hedgerows than those which are currently present. The oLEMP (REP7-026) presents initial proposals for additional biodiversity enhancements that are separate from proposed mitigation and compensation measures and are intended to provide a net gain for biodiversity. These would take place within the AyM order limits at the onshore substation site. The oLEMP sets out the key elements that will be secured in the final Landscape and Ecology Mitigation Plan (LEMP) which will be agreed with DCC, in consultation with NRW prior to any construction works commencing. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.5.10	When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity or enhancing other ecosystem service outcomes. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.	
	Draft EN-1 4.5.11	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as - reductions in GHG emissions, - reduced flood risk, - improvements to air or water quality, - climate adaptation, - landscape enhancement, or	The proposed development is brought forward to meet climate change, and therefore GHG, targets. To this effect, a life cycle assessment has been produced during the examination phase of AyM and is provided as part of the Applicant's submission at Deadline 5 in response to ExQ1.0.9 (REP5-006). As concluded within the life cycle assessment when compared with the alternative of generating the electricity by gas CCGT (with a carbon intensity of 380 g CO2eq/kWh) or BEIS's "all non-renewables" factor of 432g CO2eq/kWh, the proposed development will pay-back the embedded emissions in its construction in around two years.

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		▲ increased access to natural greenspace including trees and woodlands. The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	Further to this the Applicant has provided positive ecological enhancement proposals within the oLEMP (REP7-026). The measures are proposed to provide areas of enhancement within the onshore development areas, with particular landscape and ecological enhancement associated with the onshore substation. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.5.16	Opportunities for environmental, social, and economic enhancements, protection and mitigation measures are identified in a number of sections in Part 5 of this NPS, which provides guidance on the impacts of new energy infrastructure.	As noted in the Schedule of Mitigation and Monitoring (REP8-016), the Applicant is proposing a number of environmental, social, and economic enhancements, protection and mitigation measures. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Criteria for "good design" for energy infrastructure	Draft EN-1 4.6.8	Applicants ~~and the IPC~~ should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council ~~CABE~~ can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service.[114] Applicants should also consider any design guidance developed by the local planning authority. 114 - The Chief Planner's 2011 Letter about design and planning can be found here: See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/8009/110520- Letter_to_Chief_Planning_Officers-_Design_and_Planning.pdf Further information on the Design Council can be found here: See https://www.designcouncil.org.uk/	Design decisions in terms of project infrastructure and location are set out in the Site Selection and Alternatives ES Chapter (APP-044). Further design considerations of relevance to the onshore design are set out in the onshore Design Principles Document (REP7-028) which describes layouts, landscaping and appearance of the proposed onshore infrastructure including the onshore cable route and onshore substation. Additional detail of the potential reinstatement of the onshore cable route and screening proposals for the onshore substation is set out the oLEMP (REP7-026). With regards offshore design, AyM has been designed in so far as reasonably practicable to apply good design, siting turbines in an area that seeks to reduce visual effects, avoiding placement of turbines within the Liverpool Bay SPA, whilst also complying with the necessary safety requirements with respect to safe navigation and operation of Search and Rescue procedures. Further design refinements, such as reducing turbine height or altering colour are not considered feasible due to the flexibility needed to account for uncertainty in technological advances (as recognised in NPS EN-3) or due to other considerations such as operational safety which requires the turbines to be appropriately marked and painted to comply with navigational safety requirements. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.9.2	Climate change is ~~likely to mean that the UK will experience~~ already altering the UK's weather patterns and this will continue to accelerate depending on global carbon emissions. This means it is	Each topic-specific chapter of the ES includes a description of the evolution of the baseline environment relevant to that ES topic, that would occur without the implementation of the development, so far as

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Climate change adaptation		likely there will be more extreme weather events, such as heavy rainfall and very hot days which will be more intense and more frequent. As well as climatic and seasonal changes such as hotter, drier summers and warmer, wetter winters, there is also a likelihood of increased flooding, drought, heatwaves, and intense rainfall events, as well as rising sea levels, increased storms and coastal change. Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening.	natural changes from the baseline scenario can be assessed. The baseline environment is expected to change in response to natural variation, including through wider changes in climate expected over the lifetime of AyM. The ES also demonstrates AyM's resilience to such changes through consideration of the Maximum Design Scenario (MDS). The MDS for AyM has been produced to anticipate any potential changes between application and detailed design based on conservative estimates of UK climate projections. These changes could be technological (with the introduction of new technology) or environmental (such as new climate change predictions). At the detailed design stage, the Applicant will have regard to the latest set of climate change projections, examples include: • Changes in marine conditions (sea level, wave heights, currents, salinity etc.) that affect the elevation and design strength of offshore foundation components; • Changes in wind speed, turbulence, air density or humidity that affect wind turbine loads and generation. Onshore this affects the design of substation buildings and components; • Changes in air temperatures that affect the cooling systems of key components, onshore and offshore; • Changes in water and soil temperatures, affecting the maximum rating of buried cables; • Changes in rainfall that affect the design of drainage systems; and • Changes in air composition and climatic conditions (i.e. rainfall, seawater aerosols) that affect component degradation rate and lifetime. Once construction is complete, the O&M (operation and maintenance) strategy will be adjusted to fit any added contingency coming from climate change induced variability. This list is not exhaustive but illustrates how the Applicant is taking the necessary action to ensure the operation of the infrastructure over its estimated lifetime. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 4.9.6	Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	
	Draft EN-1 4.9.8 and 4.9.9	New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change~~. While not required by the EIA Directive,~~ using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, [142] Climate Impacts Tool, [143] and British Standards for climate change adaptation, [144] in accordance with the EIA Regulations. This information will be needed by the Secretary of State. 142 – See https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances or See https://gov.wales/climate-change-allowances-and-flood-consequence-assessments-cl-03-16 143 – See https://www.gov.uk/government/publications/climate-impacts-tool 144 - See https://www.iso.org/standard/68507.html	
Pollution control and other environmental	Draft EN-1 4.11.16	The Secretary of State should not refuse consent on the basis of pollution impacts unless ~~it has~~ there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. On this basis, it is reasonable for the Secretary of State to consider residual	The ES provides a full and detailed account of potential environmental impacts associated with AyM, specifically with regards potential pollution in the offshore and onshore environment. The relevant ES chapters conclude that no likely significant effect would occur either from the project alone, or cumulatively with other plans and projects,

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regulatory regimes		amenity issues only when considering whether the development itself is an acceptable use of the land or sea, and on the impacts of that use.	from any sources of pollution. This conclusion is drawn through reference to established mitigation measures which the Applicant has proposed to implement as part of the proposed project, if consented. For example, the Applicant has prepared an outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) (REP2-037) for onshore activities which is secured in the draft DCO (REP8-118), and anticipates that a Marine Pollution Contingency Plan (MPCP) would be conditioned within any Marine Licence granted by NRW (see Condition 12 of the Marine Licence Principles (REP8-014)). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
EN1 Part 5: Generic Impacts			
Air Quality and emissions	Draft EN-1 5.2.9	Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts.	Volume 3, Chapter 11 of the ES Air Quality (AS-030) determines that AyM will not lead to a breach of statutory air quality limits. Notwithstanding this, the Applicant has included an Outline Air Quality Management Plan with the application, and at Deadline 2, to ensure appropriate mitigation measures are secured as part of AyM (REP2-031). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.2.13	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.11 on the interface between planning and pollution control therefore apply. The SoS must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the Government's Environmental Improvement Plan.	Volume 3, Chapter 11 of the ES Air Quality (AS-030) determines that AyM will not lead to a breach of statutory air quality limits. Notwithstanding this, the Applicant has included an Outline Air Quality Management Plan with the application, and at Deadline 2, to ensure appropriate mitigation measures are secured as part of AyM (REP2-031). Mitigation measures for construction activities put forward as part of the project application are presented in Table 19 of Volume 3, Chapter 9: Air Quality (AS-030). Further to this the Applicant has included an Outline Air Quality Management Plan (REP2-031) with the application, and at Deadline 2, to ensure appropriate mitigation measures are secured as part of AyM. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.2.15	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	The Air Quality ES chapter (AS-030) has assessed the potential impacts of AyM on air quality and concluded that no significant effects will occur and there will be no significant impact on any sensitive receptors.

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	Draft EN-1 5.2.16	Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Greenhouse Gas Emissions	Draft EN-1 5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the development consent order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, peatland restoration and through other natural habitats.	As a renewable energy development, AyM will make a positive contribution to reducing greenhouse gas emissions. Further information can be found in the Applicant's life-cycle assessment (REP5-006). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Biodiversity and geological conservation	Draft EN-1 5.4.10	Marine Protected Areas Marine Protected Area (MPA) is a term used to describe the network of HRA sites, SSSIs and MCZs in the English and Welsh marine environment.	The Applicant has undertaken an assessment of impacts to HRA sites in the RIAA (REP8-055) and concluded no AEoI, either from the project alone or in-combination with other plans, projects and activities. Assessment of potential impacts to the Great Orme SSSI has been given in REP8-055. No significant effects on these sites are predicted. AyM is located sufficiently distant from MCZs such that there is no potential for impacts on these sites. On this basis, AyM is not expected to compromise the integrity of the MPA network. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.11	It is important that relevant guidance on managing environmental impacts of infrastructure in marine protected areas is followed, and that equal consideration of the effect of proposals should be given to all MPAs regardless of the legislation they were designated under. This is because all sites contribute to the network of MPAs and therefore to overall network integrity.	
	Draft EN-1 5.4.14	Ancient woodland, veteran trees and other irreplaceable habitats Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.	The Applicant has undertaken an assessment of impacts to biodiversity and nature conservation in REP8-061and has committed to mitigation, compensation and enhancement as outlined in the oLEMP (REP7-026). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.15	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. ~~Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat.~~ Ancient ~~Aged~~ or veteran trees found outside ancient woodland are also particularly valuable ~~for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons~~	AyM, as illustrated in Figure 11 *et seq*. of the onshore biodiversity chapter of the ES (REP8-061), avoids interaction with the majority of ancient woodland and veteran trees as a result of the robust approach to site selection. The proposed onshore export cable does, however, interact with some areas of ancient woodland which could not be avoided. Whilst avoidance was not possible, the assessment concludes no adverse effect on ancient woodland and veteran trees, and introduces a number of mitigation measures such as HDD (or other trenchless technique) under ancient woodland and avoidance of veteran trees where practicable (Table 13 of REP8-061) which ensure no significant adverse effect will occur.

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		~~why~~. Other types of irreplaceable habitats include blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.	As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.24	In Wales, applicants should consider the guidance set out in Section 6.4 of Planning Policy Wales and the relevant policies in the Wales National Marine Plan.[185] 185 – See https://gov.wales/marine-planning	Section 4.5 of the Planning Statement (REP8-083) sets out compliance with marine policy, including the MPS and the Welsh National Marine Plan (WNMP). As there is no demonstrable conflict between the MPS, WNMP and AyM, there is similarly no conflict with the NPS. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.25	Habitats Regulations ~~Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations79, (which implement the relevant parts of the Habitats Directive and the Birds Directive80 in England and Wales) consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular81. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment~~ The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to agree and record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	AyM has been considered against the four-staged approach to the Habitats Regulations Assessment (HRA) process, in line with PINS Advice Note 10: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects (2017). PINS Advice Note 10 version 9 was published in August 2022, which is after AyM was accepted for examination. Paragraph 4.3.1 of NPS EN-1 is addressed in sections 5.4, 5.7, 5.9 and 5.10 to 5.13 of Volume 3, Chapter 5 of the ES Onshore Biodiversity (REP8-061). The Report to Inform Appropriate Assessment (REP8-055) presents the outcomes of assessment including in combination with other plans or projects and provides the necessary information for the ExA and SoS. NRW were consulted on the HRA screening during the scoping phase and the draft RIAA during the Evidence Plan process, to ensure all information required to complete the Appropriate Assessment, including mitigation measures, was provided. The proposed mitigation measures are included within the RIAA (REP8-055), and the Schedule of Mitigation (REP8-016). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.29	It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	The Applicant has provided a detailed consideration of the potential effects on MPAs and has concluded that there will be no adverse effects on any site, either alone or in-combination with other projects or plans. The conclusions drawn have been subject to detailed

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	Draft EN-1 5.4.30	Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development.	consultation, and the relevant regulators have note agreement with the conclusions, NRW in particular noting at Deadline 5 (REP5-039) that they agree there will be no adverse effects, either alone or in-combination, on for example ornithological sites. A number of mitigation measures have been proposed, and secured within the proposed DCO (REP8-188) and Schedule of Mitigation and Monitoring (REP8-016), the detail of which has been agreed with NRW, and the implementation of which will ensure that there are no adverse effects on designated sites. As such the proposed development is in accordance with this draft NPS provision, and the Secretary of State can place significant weight on the proposed development having no adverse significant effects on any designated sites.
	Draft EN-1 5.4.31	Before submitting an application, applicants should seek the views of the SNCB and Defra/Welsh Government as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority.	
	Draft EN-1 5.4.32	Ancient woodland, veteran trees and other irreplaceable habitats Applicants should include measures to mitigate the direct and indirect effects of development on ancient woodland, veteran trees or other irreplaceable habitats during both construction and operational phase.[186]	AyM, as illustrated in Figure 11 *et seq*. of the onshore biodiversity chapter of the ES (APP-066), avoids interaction with the majority of ancient woodland and veteran trees as a result of the robust approach to site selection. The proposed onshore export cable does, however, interact with some areas of ancient woodland which could not be avoided. Whilst avoidance was not possible the assessment concludes no adverse effect on ancient woodland and veteran trees, and introduces a number of mitigation measures such as HDD (or other trenchless technique) under ancient woodland and avoidance of veteran trees where practicable (Table 13 of REP8-061) which ensure no significant adverse effect will occur. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.33	Protection and enhancement of habitats and other species Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.5.	The Applicant has submitted an oLEMP (REP7-026) which provides the proposed approach to enhancement of biodiversity and is supported by NRW. AyM will deliver net benefits for biodiversity, and the potential for these enhancements is set out in REP8-037, with commentary on the weight that should be attributed to enhancements in REP8-038. Whilst not a policy requirement, the Applicant has also provided commentary on the opportunities for ecological enhancement in the marine environment in REP8-036. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 5.4.35	~~The~~ Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works • the timing of construction has been planned to avoid or limit disturbance • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements • habitats will, where practicable, be restored after construction works have finished • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, ~~to~~ create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised.	Table 13 of the onshore biodiversity chapter (REP8-061) provides a detailed consideration of the proposed mitigation measures which ensure the project does not result in significant adverse effects. The measures include *inter alia* the provision of an oLEMP, which will ensure construction activities are confined to specific areas of works. The oLEMP (REP7-026) and Code of Construction Practice (CoCP) (REP7-018), will ensure best practice is followed, alongside the oLEMP, and to ensure that damage to species or habitats is minimized. Further to these measures, the Applicant has committed to reinstatement of habitats, and enhancement measures. These are also recorded within the oLEMP (REP7-026), which is a Requirement of the dDCO (REP8-118) and will be revised in advance of construction when the final design details are known. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.39	The government's 25 Year Environment Plan[187] and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere. 187 - See https://www.gov.uk/government/publications/25-year-environment-plan. An updated Environmental Improvement Plan 2023 has also been published in February 2023: https://www.gov.uk/government/publications/environmental-improvement-plan	As noted within the Applicant's extant NPS tracker (REP8-032) and in response to the extant NPS, geological interests have been conserved through sensitive routing of the onshore Export Cable Corridor (ECC) and siting of the OnSS. There are no geologically designated sites within the ground conditions and land use study area. Routing and siting considerations are discussed in ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044).

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	Draft EN-1 5.4.40	In addition, in exercising functions in relation to Wales, the Secretary of State should consider Section 6 of the Environment (Wales) Act 2016[188] and seek to maintain and enhance biodiversity, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of the Secretary of State's functions. 188 - See https://www.legislation.gov.uk/anaw/2016/3/section/6/enacted	Further to this the Applicant has submitted an oLEMP (REP7-026) which provides the proposed approach to enhancement of biodiversity. As such the application is in accordance with this draft NPS provision, insofar as the drafting may remain as currently drafted, and the Secretary of State may place weight on not only the benefits associated with this low carbon energy proposal but also the biodiversity benefits proposed. Onshore, AyM will deliver net benefits for biodiversity, and the potential for these enhancements is set out in document REP8-037, with commentary on the weight that should be attributed to enhancements in document REP8-038. Whilst not a policy requirement, the Applicant has also provided commentary on the opportunities for ecological enhancement in the marine environment in document REP8-036. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.44	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.	The Applicant has provided a comprehensive assessment, accompanied by appropriate mitigation measures which are recorded in the individual technical chapters, and the Schedule of Mitigation and Monitoring (REP8-016). In turn the necessary mitigation is secured in the dDCO (REP8-118) and conditions included in the Marine Licence Principles document (REP8-014). As such it is considered that AyM is in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.46	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. ~~When considering proposals, the IPC should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate.~~ The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	The proposed enhancement measures set out in the oLEMP (REP7-026) provide net benefits for biodiversity in addition to mitigation to reduce and/or eliminate the potential for significant effects. Onshore, AyM will deliver net benefits for biodiversity as set out in document REP8-037, with commentary on the weight that should be attributed to enhancements in document REP8-038. Whilst not a policy requirement, the Applicant has also provided commentary on the opportunities for ecological enhancement in the marine environment in document REP8-036. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 5.4.49	Habitats Regulations ~~Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations, (which implement the relevant parts of the Habitats Directive and the Birds Directive80 in England and Wales)~~ The Secretary of State must consider whether the project may have a likely significant effect on a ~~European~~ protected site ~~or on any site to~~ which ~~the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular81. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.~~ is part of the National Site Network (an HRA Site), a Marine Protected Area (MPA), or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	AyM has been considered against the four-staged approach to the Habitats Regulations Assessment (HRA) process, in line with PINS Advice Note 10: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects (2017). PINS Advice Note 10 version 9 was published in August 2022, which is after AyM was accepted for examination. Paragraph 4.3.1 of NPS EN-1 is addressed in sections 5.4, 5.7, 5.9 and 5.10 to 5.13 of Volume 3, Chapter 5 of the ES Onshore Biodiversity (APP-066). The Report to Inform Appropriate Assessment (REP8-055) presents the outcomes of assessment including in combination with other plans or projects and provides the necessary information for the ExA and SoS. NRW were consulted on the HRA screening during the scoping phase and the draft RIAA during the Evidence Plan process, to ensure all information required to complete the Appropriate Assessment, including mitigation measures, was provided. The proposed mitigation measures are included within the RIAA (REP8-055), and the Schedule of Mitigation (REP8-016). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.52	Marine Protected Areas The Secretary of State should assess the impact, either alone or in combination, on all designated MPA sites when making any decision on development consent.	The Applicant has undertaken an assessment in the RIAA (REP8-055) and has concluded that AyM will not result in AEoI, either alone or in-combination with other plans, projects and activities. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.4.54	Ancient woodland, veteran trees and other irreplaceable habitats ~~Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated.~~ The Secretary of State should not grant development consent for any development that would result in ~~its~~ the loss or deterioration ~~unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for~~	AyM, as illustrated in Figure 11 *et seq*. of the onshore biodiversity chapter of the ES (REP8-061), avoids interaction with the majority of ancient woodland and veteran trees as a result of the robust approach to site selection. The proposed onshore export cable does, however, interact with some areas of ancient woodland which could not be avoided. Whilst avoidance was not possible the assessment concludes no adverse effect on ancient woodland and veteran trees, and introduces a number of mitigation measures such as HDD (or other trenchless technique) under ancient woodland and avoidance of veteran trees where practicable (Table 13 of REP8-061) which ensure no significant adverse effect will occur.

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		~~their conservation or, where their loss is unavoidable, the reasons why.~~ of any irreplaceable habitats, including ancient woodland, and ancient or veteran trees unless there are wholly exceptional reasons[190] and a suitable compensation strategy exists. 190 - For example where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat.	As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Civil and military aviation and defence interests	Draft EN-1 5.5.2	Collaboration and co-existence between aviation and energy industry stakeholders should strive for scenarios such that neither is unduly compromised.	The Applicant has considered in detail the potential impacts on civil and military aviation and concluded that with the proposed mitigation and management measures there will be no adverse effects on aviation and defence interests. As noted in the Applicant's Statement of Commonality (REP8-125), the mitigation measures will be achieved through ongoing commercial agreement with NATS, CAA and the MoD. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.3	Whilst energy infrastructure, such as wind turbines, are an established part of the expected built energy environment, issues such as the cumulative impact, location and increasing geographical spread and height of offshore windfarms, can all potentially have a bearing on aviation safety, defence capabilities and weather warnings and forecasts.	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). The assessment of civil and military aviation flight patterns and infrastructure is provided in section 13.10 *et seq*. of the ES Chapter. Cumulative effects are discussed within section 13.13. Table 2 of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059) provides the results of consultation activity. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.23	Windfarms are an integral part of the plan to achieve Net Zero, as well as delivering affordable clean energy to consumers. The government has an official ambition to deliver up to 50GW of offshore wind by 2030 and the Committee on Climate Change's 6th Carbon Budget (CB6) views offshore wind as the backbone of electricity generation across all its scenarios. The Offshore Wind Sector Deal confirmed that government will work collaboratively with the energy sector and wider stakeholders to address strategic deployment issues including aviation and surveillance systems including radar.	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). The assessment of civil and military aviation flight patterns and infrastructure is provided in section 13.10 *et seq*. of the ES Chapter. Cumulative effects are discussed within section 13.13. Table 2 of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059) provides the results of consultation activity. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.24	Whilst it is hoped that future surveillance technologies will enable civil and military aviation, defence and meteorological surveillance providers and offshore windfarms to meet coexistence challenges, it should not be assumed, however, that there will be sufficient	

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		advancement in surveillance technologies to meet all future requirements.	
	Draft EN-1 5.5.25	A "system of systems" approach may help address the impacts on air surveillance and routine air traffic control operations for those windfarms that exist when radar or other surveillance systems are procured, however this can add complexity to aviation safety assurance and operating practices.	
	Draft EN-1 5.5.26	Surveillance methods that rely on cooperation alone, such as Automatic Dependent Surveillance – Broadcast (ADS-B) or Secondary Surveillance Radar transponders, are not sufficient to meet the UKs security and national defence requirements nor would they assure the flight safety of air traffic from non-cooperative threats.	
	Draft EN-1 5.5.27	MOD recognises that the environmental baseline includes existing windfarms and any mitigation solutions that have been established to support them when procuring future radar systems.	
	Draft EN-1 5.5.28	As existing CNS infrastructure reaches the end of its operational life, replacement options that are more tolerant of wind turbines, if available, should be installed by CNS owners/operators to futureproof aerodromes against possible future turbine installations in order to maintain or enhance aviation safety. This should be considered on a case-by-case basis, so that the correct solution(s) are identified which strike the balance between surveillance quality/needs and reasonableness of costs being achieved, whilst maintaining safety.	
	Draft EN-1 5.5.29	Applicants should provide relevant information on proposed developments to enable CNS owners/operators to consider upgrades appropriately	
	Draft EN-1 5.5.30	Weather warnings and forecasts The UK weather radar network is composed of 15 weather radars that are operated and maintained by the Met Office. Each radar provides data out to 255km that underpin the Public Weather Service and the provision of critical meteorological information to a range of stakeholders including aviation, defence, civil contingencies, and the wider UK population, and in the case of severe weather, through the National Severe Weather Warning Service (NSWWS).	

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	Draft EN-1 5.5.31	Weather radars are currently the only means of detecting the presence and location of precipitation in real time. The main hazard from precipitation is flooding and assessment of the potential flood impacts are carried out in consultation with the UKs authoritative flood agencies.	
	Draft EN-1 5.5.32	Some energy structures, such as wind turbines, have the potential to adversely impact weather radar signals, even beyond 100km from the radar. This can lead to downstream impacts in meteorological and hydrological warning systems that use radar data, which in turn decreases the credibility of warning systems. For example, when the size of the affected area exceeds the typical size of storms, warning systems may miss the initial stages of a significant rainfall event, which can cause delays in issuing warnings.	
	Draft EN-1 5.5.33	The Met Office protects its weather radars by engaging in the formal planning consultation process. Met Office weather radars are officially safeguarded[196] and as per Secretary of State direction will be consulted directly on all relevant applicable planning applications within safeguarded zones by local planning authorities.[197] 196 – Town & Country Planning (Safeguarded Meteorological Sites) (England) Direction 2014, The Town and Country Planning (Safeguarded Aerodromes, Technical Sites, Meteorological Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2016), Town and Country Planning (Crug-yGorllwyn) Technical Site Direction (2016), Town and Country Planning (Safeguarded Meteorological Sites) Order 2014, Meteorological (Castor Bay) Technical Sites Direction 197 - See https://www.gov.uk/guidance/consultation-and-pre-decision-matters#safeguarding-directions	
	Draft EN-1 5.5.37	The Joint industry and government Air Defence and Offshore Wind Mitigation Task Force was set up to enable the co-existence of UK Air Defence and offshore wind. The Strategy and Implementation Plan[198] sets the direction for that collaboration. The recommendations generated from this Task Force should be referred to by both aviation and energy stakeholders. 198 - See https://www.gov.uk/government/publications/air-defence-and-offshore-wind-working-together-towards-netzero/air-defence-and-offshore-wind-working-together-towards-net-zero	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 5.5.39	The requirement for ATC and non-cooperative surveillance – i.e. radar/tracking technologies - forms part of the environmental baseline for proposed developments.	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). The assessment of civil and military aviation flight patterns and infrastructure is provided in section 13.10 *et seq.* of the ES Chapter. Cumulative effects are discussed within section 13.13. Table 2 of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059) provides the results of consultation activity. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.42	In addition, consideration of developments near aerodromes should take into account the following factors: • Bird Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary)[200]. • Building Induced Turbulence - If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plume Turbulence - This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft. 200 - CAP 772 Wildlife Hazard Management at Aerodromes	
	Draft EN-1 5.5.44	The applicant should include appropriate mitigation measures as an integral part of the proposed development.	Mitigation measures that were identified and adopted as part of the evolution of the project design (embedded into the project design) and that are relevant to military and civil aviation are listed in Table 8 of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). The mitigation includes embedded measures such as design changes and applied mitigation which is subject to further study or approval of details; these includes avoidance measures that will be informed by

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			preconstruction surveys, and necessary additional consents where relevant. The mitigation measures proposed are considered adequate, with no material residual impact on radar, communications and navigational systems predicted. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.46	For CNS infrastructure, the UK military Low Flying system (including TTAs) and designated air traffic routes, mitigation may also include: ▲ lighting ▲ operational airspace changes ▲ ~~upgrading of existing~~ agreement to upgrade CNS infrastructure, the cost of which the applicant may reasonably be required to contribute in part or in full until the end of the life of the surveillance equipment if subsequently replaced by a fully windfarm tolerant system. If an appropriate system upgrade cannot be identified at the point of application, the applicant may be required to contribute in part or in full to any future upgrade for the lifetime of the wind farm. Costs should be reflective of need and impact of the energy installation on the monitoring equipment ▲ introducing radar mitigation technology to the development, e.g. by using non-radar reflecting materials to manufacture wind turbine blades	The assessment of civil and military aviation flight patterns and infrastructure is provided in section 13.10 *et seq.* of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). Cumulative are discussed within section 13.13. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.49	Consideration from energy stakeholders should also be given to the possibility of introducing radar mitigation technology as windfarm assets are renewed and replaced e.g., by using non-radar reflecting materials to manufacture turbine blades.	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.53	In the case of meteorological radars, the Secretary of State should consider the extent to which the provision of weather and flood warnings is compromised.	

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	Draft EN-1 5.5.54	If there are conflicts between the government's energy and transport policies and military interests in relation to the application, the Secretary of State should expect the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible, recognising simultaneously the evolving landscape in terms of the UK's energy security and the need to tackle climate change, which necessitates the installation of wind turbines and the need to maintain air safety and national defence and the national weather warning service.	There are no conflicts between the Government's energy and transport policies and military interest in relation to AyM. Table 2 of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059) provides the results of consultation activity undertaken, with the agreed Mitigation principles provided in section 13.9 *et seq.* of the Chapter. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.56	Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting.	AyM will not have a significant effect on civil or military aviation and/or defence assets, as detailed in Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.5.57	Where new technologies to mitigate the adverse effects of wind farms on surveillance systems, such as radar, are concerned, the Secretary of State should have regard to any government guidance which emerges from the joint government/Industry Aviation Management Board and the Joint Air Defence and Offshore Wind Task Force.	
	Draft EN-1 5.5.60	Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider~~s~~ that: • a development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local/national economic loss, or emergency service needs • the benefits of the proposed development are outweighed by the harm to aerodromes serving business, training or emergency service needs, taking into account the relevant importance and need for such aviation infrastructure; or • it would cause harm to aerodromes' training or emergency service needs,	The assessment of civil and military aviation flight patterns and infrastructure is provided in section 13.10 *et seq.* of Volume 2, Chapter 13 of the ES Military and Civil Aviation (APP-059). Cumulative effects are discussed within section 13.13 of APP-059. The conclusions drawn are that there are no significant effects. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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		▲ the development would ~~significantly~~ impede or compromise the safe and effective use of defence assets or ~~significantly~~ unacceptably limit military training ▲ the development would have a~~n~~ negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on ~~the~~ CNS infrastructure ~~required to support communications, navigation or surveillance systems;~~ ▲ the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UKs flood agencies ~~consent should not be granted~~.	
	Draft EN-1 5.5.61	Provided that the Secretary of State is satisfied that the impacts present risks to national security and physical safety, such that they outweigh the urgent need for an acceleration in the deployment of offshore wind, or other technology; and provided that the Secretary of State is satisfied that all efforts have been made by the parties to find an acceptable mitigation of the impact, and that such mitigation is not available, consent should not be granted.	At this stage no national security implications have been identified for AyM. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Coastal change	Draft EN-1 5.6.14	The applicant should be particularly careful to identify any effects of physical changes on the integrity and special features of Marine ~~Conservation Zones~~ Protected Areas (MPAs). These could include MCZs, HRA Sites including ~~candidate marine~~ Special Areas of Conservation ~~(SACs), coastal SACs and candidate coastal SACs, coastal Special Protection Areas (SPAs) and potential coastal SPAs~~ and Special Protection Areas with marine features, Ramsar Sites, Sites of Community Importance ~~(SCIs) and potential SCIs and Sites of Special Scientific Interest.~~, and SSSIs with marine features. Applicants should also identity any effects on the special character of Heritage Coasts[206]. 206 - See https://www.gov.uk/government/publications/heritage-coasts-protecting-undeveloped-coast/heritagecoasts-definition-purpose-and-natural-englands-role	Designated nature conservation sites within the physical processes study area have been described in Section 7 of the Marine Geology, Oceanography and Physical Processes chapter of the ES for the array area and for the offshore Export cable corridor (ECC) (REP8-084). The predicted changes to physical processes have been considered in relation to indirect effects on other receptors elsewhere in the ES, in particular in Volume 2, Chapter 5 of the ES Benthic Subtidal and Intertidal Ecology (APP-051) and within the RIAA (REP8-055). The assessment for AyM concludes that there will be no adverse effect on the integrity and special features of nationally and internationally designated sites of conservation importance. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Dust, odour, artificial light, smoke, steam and insect infestation	Draft EN-1 5.7.9	Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in DCO requirements.	With appropriate measures in place, it is considered that all reasonable steps have been taken to minimise potential impacts of dust, odour, artificial light, smoke, steam or insect infestation, through implementation of the outline Code of Construction Practice (REP7-028), and other relevant management plans such as the outline

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	Draft EN-1 5.7.10	Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition.	Artificial Light and Emissions Plan (REP2-045) and outline Air Quality Management Plan (REP2-030). As acknowledged at paragraph 5.6.3 of EN-1, some impact on amenity for local communities are unavoidable, however, mitigation is proposed to keep any impacts to a minimum. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.7.11	A construction management plan may help clarify and secure mitigation.	
Flood Risk	Draft EN-1 5.8.11	~~All three~~ Both elements of the Exception Test will have to be ~~passed~~ satisfied for development to be consented. ~~For~~ To pass the Exception Test ~~to be passed~~ it should be demonstrated that: • ~~it must be demonstrated that~~ the project would provide~~s~~ wider sustainability benefits to the community[214] that outweigh flood risk; and • the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and • ~~a FRA must demonstrate that the project will be safe~~ the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere ~~subject to the exception below~~, and, where possible will reduce flood risk overall. 214 - These would include the benefits (including need), for the infrastructure set out in Part 3.	The Exception Test has not been required for AyM, and as such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques	A summary of the flood risk assessment is provided in Volume 3, Chapter 7 of the ES Hydrology, Hydrogeology and Flood Risk (APP-068). Flood Consequence Assessment reporting has been undertaken in consultation with NRW and Denbighshire County Council (DCC) and is presented in the following documents: Volume 5, Annex 7.1 of the ES (APP-137) and Volume 5, Annex 7.2 of the ES (APP-138), and by technical flood experts from SLR Consulting. The Flood Consequence Assessment presents a volume of information which is considered proportionate to the scale, nature and location of AyM; that is that the buried infrastructure (as assessed in the Onshore Export Cable Corridor Flood Consequence Assessment (REP1-042)) does not introduce a new or increased pathway by which the risk of flooding may increase, and the above ground infrastructure (onshore) is considered in appropriate detail and introduces appropriate mitigation (as assessed in the Onshore Substation Flood Consequences Assessment (REP1-044)).

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			Both Flood Consequence Assessments consider in detail the potential effects, both positive and adverse, of the proposed infrastructure, storage areas, and temporary disruption to drainage channels. The proposed project has committed to the HDD (or other trenchless technique) under the raised flood defences at landfall and the river Clwyd, and as such there is no risk associated with raised defences (REP1-042 and REP1-044). Both Flood Consequence Assessments consider the different types and effects of flooding through reference to an appropriate (and agreed with regulators) baseline investigation. For example, each of sections 3.1 to 3.6 of the Onshore Substation Flood Consequences Assessment (REP1-044) consider inter alia historic, fluvial, tidal and surface water flooding, and the capacity of the receiving environment to absorb or soak water both in advance of and following construction of AyM. The Flood Consequence Assessment undertaken for the Onshore Substation considers the limited risk of flooding associated with the project, in addition to the risk of flooding impacting the Onshore substation. These assessments are considered in sections 3.1 to 3.5 of the Flood Consequences Assessment and conclude the risk is low, specifically with the introduction of a drainage strategy, which is presented at Appendix A to the Flood Consequences Assessment (APP-138) and revised at Deadline 1 (REP1-045). Section 3.6 of the Flood Consequences Assessment provides consideration of the effects of climate change, and the proposed lifetime of the project. In light of the detail presented in both the Flood Consequence Assessments as submitted with the application, and subsequent revisions, as such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted
	Draft EN-1 5.8.21	The Sequential Test[222] ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas. 222 - See https://www.gov.uk/guidance/flood-risk-and-coastal-change#the-sequential-approach-to-the-location-ofdevelopment	In Wales, application of the Sequential Test is covered by the Justification Test under TAN15. An FCA for the onshore ECC, which includes the consideration of the 'justification test' as required by TAN15 is provided in Volume 5, Annex 7.1 (APP-137). The FCA for the OnSS shows the OnSS to be in a low risk flood area and as such this aspect of development is not subject to the Justification test. The FCA is provided in Volume 5, Annex 7.2 (REP-044). A sequential approach has therefore been applied at the site level for both the transmission assets and onshore substation and the risk of flooding has been minimized. AyM is therefore in line with both national (UK and Welsh) and local flood risk management strategies.

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	Draft EN-1 5.8.30	Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	The Applicant has undertaken an assessment of potential impacts to hydrology and flood risk in REP8-063 and has concluded that there will be no significant residual effects, accounting for predicted changes to flood risk as a result of climate change over the course of the development. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.8.31	Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	
	Draft EN-1 5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.	
	Draft EN-1 5.8.35	Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	
Historic environment	Draft EN-1 5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these in the ES (see Section 4.2). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	Effects on designated and non-designated heritage assets have been considered at sections 8.10 to 8.13 of ES Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage (APP-069). This includes assets above, at and below ground level. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Landscape and visual	Draft EN-1 5.10.4	Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement.	It is important to note that, as a result of the requirements of the 2017 Extensions round, there are limitations with regards to the possible siting of Extension projects; this is recognised in the 2021 draft NPS EN-3. Notwithstanding this, the project has undertaken a design process that

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	Draft EN-1 5.10.5 and 5.10.6	~~Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape.~~ Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	goes as far as practicable to develop a design that seeks to minimise harm/ change to the receiving environment, and this is reflected in the iterative process that has been applied to the scheme throughout the pre-application process. To gain a thorough understanding of the capacity for the seascape and landscape to accommodate change, an assessment of the existing character has been completed for both seascape, with regards to the offshore turbines and other infrastructure, and landscape with regards to the onshore substation (REP8-087 and REP8-082 respectively). With regards to careful project design, the onshore substation and National Grid connection have been sited outside of any designated areas, such as the Isle of Anglesey AONB. The site selection process (see Site Selection and Alternatives ES chapter Volume 1, Chapter 4, Site Selection and Assessment of Alternatives (APP-044)) indicated that the onshore substation could be accommodated at the Bodelwyddan location without significant effects on the special qualities of any areas designated for visual amenity. The sensitivity of the landscape and visual receptors in the LVIA study area has been a key consideration in the siting and design of the onshore infrastructure. A detailed consideration and assessment of the capacity of the landscape to accommodate the onshore infrastructure in relation to the screening afforded by the existing landforms, trees and hedgerows between sensitive receptors and the project infrastructure has been undertaken in the Landscape and Visual Impact Assessment ES chapter Volume 3, Chapter 2 (REP8-087). Additional landscape mitigation measures for the onshore substation are described in the Landscape and Visual Impact Chapter (*ibid*) and the oLEMP (REP7-028). The extent of mitigation planting incorporated into the design is illustrated in the oLEMP. This includes woodland planting of: ▲ Core native woodland; ▲ Screen native woodland mix; ▲ Native woodland edge mix; and ▲ Native hedgerows. Photomontage visualisations showing predicted views of the onshore substation are shown without mitigation and with the landscape mitigation at 15 years post-planting in ES Figures 2.18 to 2.19 (APP-181 to APP-189)

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			With regards to careful design offshore, the turbines and other infrastructure have been sited, as far as reasonably practical, to avoid and minimise significant effects on the special qualities of the AONBs within the zone of theoretical visibility. A detailed consideration and assessment of the capacity of the seascape to accommodate the offshore infrastructure in the context of the existing baseline, characterised in many respects by the presence of offshore wind farm projects, has been undertaken in the SLVIA Chapter (REP8-082). It is considered that although the offshore infrastructure extends the influence of the seascape and results in significant effects on some of the character and views from areas of the North Wales and Anglesey coast these effects are not significant on all receptors. Furthermore, feedback received during public engagement events and recorded in the Consultation Report (APP-024), indicates a generally positive acceptance of additional turbines within the seascape. As such it is considered that there is capacity for AyM to be accommodated at the proposed location in seascape, landscape and visual impact terms. As noted in the context of alternatives and recognised in the extant and draft NPS EN-3 the Applicant is constrained in its ability to avoid impacts on visual receptors. Notwithstanding this, the Applicant has undertaken a rigorous and comprehensive consultation process in order to refine the design, minimise the harm and provide reasonable mitigation measures as far as practicable whilst maintaining an economically viable alternative. Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.10.8	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid ~~compromising~~ harming the purposes of designation or to minimise adverse impacts on designated areas, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland or National Parks and AONBs in Wales, as well as projects in Wales which may have impacts on National Parks and AONBs in England.	As mentioned in 5.9.9 & 5.9.10 of EN-1 (REP8-032), it is recognised that the offshore infrastructure is apparent from a number of viewpoints within the AONBs and Snowdonia National Park. The SLVIA Chapter (REP8-082) has assessed that there would be significant adverse effects on the settings of Isle of Anglesey AONB and Snowdonia National Park. However, following consideration of the factors set out in the assessment it is considered that mentioned significant adverse effects, on a limited number of special qualities, would not occur to such a degree that it would affect the overall integrity of the AONB or National Park, or their inherent natural beauty. Whilst it is recognised that there are significant effects, and some harm, it is considered that the ability to avoid impacts is constrained by the requirements placed on the site selection process, namely that AyM must share at least one boundary with its sister project Gwynt y Môr

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			(GyM). The effect and associated harm have therefore been minimised as far as is practicable. As noted previously, it is also relevant to note that the primary purpose of AONBs and National Parks is to provide recreational opportunities to the public. Following extensive consultation, it is evident that there is limited if any public opposition to AyM in the context of the AONB or National Park; the responses received (which were provided in the context of the project before it was markedly reduced) and presented in the Consultation Report (APP-024) generally strike a note of welcome in the context of renewable energy and the target to reach net zero. As such, it is considered that whilst WTGs will be visible, and there is some significant change from the baseline which results in a significant effect with regards the EIA Regulations, and some harm, it is not so substantial as to detract from the overarching purpose of National Parks and AONBs. The Applicant has undertaken comprehensive consultation in order to refine the design, minimise the harm and provide reasonable mitigation measures as far as practicable whilst maintaining an economically viable alternative. Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.10.9	Heritage Coasts are defined areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.	The Landscape and Visual Impact Assessment (LVIA) chapter (REP8-087) and Seascape and Landscape Visual Impact Assessment (SLVIA) chapter of the ES (REP8-082) assess landscape and visual effects during construction and operation. This included potential impacts on AONBs, National Parks and Heritage Coasts. They refer to published character assessments and associated studies/policies. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.10.10	Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.	
	Draft EN-1 5.10.18	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how both negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised.	
	Draft EN-1 5.10.19	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an Areas	

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		of Outstanding Natural Beauty the assessment should include effects on the natural beauty and special qualities of these areas'.	
	Draft EN-1 5.10.21	The assessment should also demonstrate how noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, will be minimised.	Construction lighting (as assessed in ES Volume 3, Chapter 2: Landscape and Visual Impact Assessment (REP8-087)) will be required during working hours in the winter months. The lights of construction vehicles will also add to the levels of lighting and a lower level of lighting will remain overnight for security purposes. Illuminations may also be needed for occasional activities which require continuous working during night time. This may occur where continuous working is necessary for matters such as concrete pours and HDD works (or other trenchless crossing techniques). Low level security lighting may also be required at night throughout the construction period. The Code of Construction Practice (CoCP) (An outline of which can be found at REP7-018) includes within it an Artificial Light and Emissions Plan (ALEP) (An outline of which can be found at REP2-045). This includes details of the location, height, design and luminance of all lighting to be used during construction. As secured in the DCO, the ALEP will be approved by DCC prior to works commencing. As stated in the outline ALEP, external lighting of the construction site will be of a low intensity and designed/ positioned to: provide the necessary levels for safe working; minimise light spillage or pollution; and avoid disturbance to adjoining residents and occupiers. Further, site lighting shall be positioned and directed to minimise nuisance to footpath users, residents, to minimise distractions to passing drivers on adjoining public highways and to minimise skyglow, so far as is reasonably practicable. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.10.31	When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty the conservation and enhancement of the natural beauty of the landscape and countryside should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. ~~Nevertheless,~~ The Secretary of State may grant development consent in these areas in exceptional circumstances. ~~The~~ Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:	In order to prioritise the conservation of the natural beauty of the landscape in accordance with paragraphs 5.9.9 and 10 of NPS EN-1 (REP8-032), no elements of the proposed AyM project are situated within areas having the highest status of protection (National Parks, the Broads and AONBs). It is recognised that the offshore infrastructure is visible from a number of viewpoints within the AONBs and Snowdonia National Park and the (REP8-082) has assessed that there would be significant adverse effects on the settings of Isle of Anglesey Area of Outstanding Natural Beauty

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		▲ the need for the development, including in terms of national considerations[243], and the impact of consenting or not consenting it upon the local economy; ▲ the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.2; and ▲ any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. 243 - National considerations should be understood to include the national need for the infrastructure as set out in Part 3 of this NPS and the contribution of the infrastructure to the national economy.	(AONB) and Snowdonia National Park (SNP) as a result of visibility of AyM as part of the wider context. The effects are assessed in Sections 10.11.3 and Section 10.11.5 of REP8-082 respectively. The assessment of the Effects on the landscape/ seascape character, views and Special Qualities of Isle of Anglesey AONB starts at paragraph 546 of REP8-082. Following consideration of the factors set out in the assessment it is considered that there would be some perceived diminishment of (harmful effects on) three of the special qualities and the natural beauty of the AONB associated with these. This is not considered to occur to such a degree that it would affect the overall integrity of the AONB or its inherent natural beauty. The assessment of the Effects on the landscape/ seascape character views and Special Qualities of Snowdonia National Park starts at paragraph 780 of REP8-082. Following consideration of the factors set out in the assessment it is considered that there may be some perceived diminishment of (harmful effects on) the Special Qualities of Diverse Views and Tranquillity but such effects are not considered to be significant and are therefore limited. There would also be some localised areas where significant adverse visual effects would arise. It is not considered that the Seascape, Landscape and Visual (SLV) receptors within the SNP would be diminished to such a degree that it would affect the overall integrity of the SNP or its inherent natural beauty. It is also relevant to consider the purpose of designating sites such as National Parks, which was to conserve and enhance their natural beauty and provide recreational opportunities for the public. Through repeat consultation events undertaken as part of the statutory and non-statutory processes for AyM it has been evident that there is limited public opposition to AyM, with the Consultation Report (APP-024) noting general support. The Applicant has sought to minimise all other potential impacts to recreational amenity associated with AyM and has a long history of supporting recreational amenity projects in North Wales such as the Green Links project which has enhanced the North Wales coastal cycle path. As has been described elsewhere in this NPS (see Section 5 of the Planning Statement (REP8-083)), there is a demonstrable and urgent need for renewable energy, and specifically offshore wind. The economic effects of AyM are considered to be beneficial, as has been concluded in the Socio Economics Chapter of the ES (REP8-088), and as has been reflected in UK Government publications; those benefits will

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			also be subject to further consideration within the Supply Chain Plan which will be produced in support of the Contacts for Difference (CfD) bid and will secure local investment. The economic benefits and policy need should also be balanced against the significant costs to the economy of unmitigated climate change (as recognised in policy terms (UK Climate Change Risk Assessment 2022 Presented to Parliament pursuant to Section 56 of the Climate Change Act 2008)). It is not feasible to locate AyM beyond the likely zone of visual impact from the AONBs or National Park, however the design of the project has been moderated such that the impacts are reduced. The Applicant has sought for example, to locate turbines outside of the zones of highest sensitivity as described in the White Consultants ready reckoner for siting of offshore wind projects document (White *et al*., 2019a); it is of note that if Wales is to develop offshore wind and meet the Welsh and UK Government targets the White Consultants ready reckoner document, and subsequent stage 2 and 3 documents (White *et al*., 2019b and 2019c) effectively renders the targets unachievable and in itself will therefore fail key policy requirements. As outlined above, there is demonstrable need for renewable energy, specifically offshore wind. AyM is situated outwith any National Parks, the Broads and AONBs and whilst it is not feasible to locate AyM beyond the likely zone of visual impact from the AONBs or National Park, it is considered that any detrimental effect on the environment can be moderated as far as practically possible. Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.10.33	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. ~~The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland~~. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse ~~refusing~~ consent.	As mentioned in 5.9.9 & 5.9.10 of EN-1 (REP8-032), it is recognised that the offshore infrastructure is apparent from a number of viewpoints within the AONBs and Snowdonia National Park. The SLVIA Chapter (REP8-082) has assessed that there would be significant adverse effects on the settings of Isle of Anglesey AONB and Snowdonia National Park. However, following consideration of the factors set out in the assessment it is considered that mentioned significant adverse effects, on a limited number of special qualities, would not occur to such a degree that it would affect the overall integrity of the AONB or National Park, or their inherent natural beauty. Whilst it is recognised that there are significant effects, and some harm, it is considered that the ability to avoid impacts is constrained by the requirements placed on the site selection process, namely that AyM must share at least one boundary with its sister project Gwynt y Môr

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
			(GyM). The effect and associated harm have therefore been minimised as far as is practicable. As noted previously, it is also relevant to note that the primary purpose of AONBs and National Parks is to provide recreational opportunities to the public. Following extensive consultation, it is evident that there is limited if any public opposition to AyM in the context of the AONB or National Park; the responses received (which were provided in the context of the project before it was markedly reduced) and presented in the Consultation Report (APP-024) generally strike a note of welcome in the context of renewable energy and the target to reach net zero. As such, it is considered that whilst WTGs will be visible, and there is some significant change from the baseline which results in a significant effect with regards the EIA Regulations, and some harm, it is not so substantial as to detract from the overarching purpose of National Parks and AONBs. The Applicant has undertaken comprehensive consultation in order to refine the design, minimise the harm and provide reasonable mitigation measures as far as practicable whilst maintaining an economically viable alternative. Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Land Use, Including Open Space, Green Infrastructure, and Green Belt	Draft EN-1 5.11.4	Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.	The effects of onshore infrastructure associated with AyM on agricultural land and soil quality are considered in Section 6.10, Section 6.11 and Section 6.12 of Volume 3 Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). Routing and siting considerations that are discussed in Volume 1, Chapter 4 Site Selection and Alternatives (APP-044). Impacts on best and most versatile land have been minimised where possible through site selection and the adherence to a soil management plan (REP7-022) during both construction works and the reinstatement of the cable corridor following cable installation. The onshore cable corridor and associated works are not expected to have any significant impact on agricultural use given the pre-condition soil survey and soil management plan. The restoration to agricultural use of onshore cable connections for offshore windfarms within this area is demonstrated through the successful restoration of the Burbo Bank Extension and Gwynt y Môr cable corridors. The Applicant considered best and most versatile (BMV) land through consideration of ALC grades within the appraisal of 'Land use' when undertaking its BRAG analysis of long-list and short-list options for the
	Draft EN-1 5.11.5	Where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.[248] 248 - https://www.gov.uk/government/publications/contaminated-land-statutory-guidance	

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
			onshore ECC and OnSS (see section 4.11 of ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044). The BRAG Analysis included consideration of a number of other environmental and engineering constraints and noting that much of the land to the south-east of Rhyl, and to the north and west of St Asaph Business Park is classed as BMV land and therefore the ability to avoid use of BMV land is limited. Although the onshore infrastructure does not utilize previously developed land, an assessment of the potential for impacts to occur from contamination is provided in Section 6.10, Section 6.11, and Section 6.7.7 of Volume 3, Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.11.6 and 5.11.7	The government's policy is to ensure there is adequate provision of high quality open space ~~(including green infrastructure)~~ and sports and recreation facilities to meet the needs of local communities. Connecting people with open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. Green and blue infrastructure[249] ~~in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change~~ can also enable developments to provide positive environmental, social, health and economic benefits. Green infrastructure includes green space such as parks and woodlands but also other environmental features such as street trees, hedgerows and green walls and roofs. It also includes blue infrastructure such as canals, rivers, streams, ponds lakes and their borders. Well designed and managed green and blue infrastructure provides multiple benefits at a range of scales. It can contribute to biodiversity recovery, sequester carbon, absorb surface water, cleanse pollutants, absorb noise and reduce high temperatures. 249 - Green infrastructure is a network of multi-functional green spaces, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities. Blue infrastructure relates to features which incorporate the water environment.	Tourism plays a major role within the local economy of North Wales. As such, the assessment as presented in Volume 3, Chapter 4, Tourism and Recreation (APP-065) considers the effects of construction, operation, and decommissioning of AyM in Sections 4.10, 4.11 and 4.11.1 respectively. Through sensitive site selection and design AyM has minimized interaction with open spaces and green infrastructure. Whilst AyM interacts with the Wales Coastal Path the interaction with the Coastal Path is managed through the outline Public Access Management Plan (oPAMP) (REP7-025) which establishes the principles for management of PRoW and is provided as part of the Outline Code of Construction Practice (REP7-018). As such AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.11.8	The ES (see Section 4.2) should identify existing and proposed[250] land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The	Chapter 6, Volume 3, Ground Conditions and Land Use (REP8-062) provides a detailed account of the surrounding land uses, and the potential impacts associated with AyM during the construction, operation, and decommissioning phases of the project. The Planning Statement (REP8-083) describes the existing surrounding land uses of the onshore export cable and onshore substation in the context of the NPS

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
		assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. 250 - For example, where a planning application has been submitted	policy tests. The Applicant has sought to avoid land that was allocated for development (for example the Key Strategic Site (KSS)) as part of the site selection process. At the end of each phase, soils would be reinstated across the temporary land take areas and the land reinstated to a standard capable of being returned to its former use. As such AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.[251] 251 - For guidance, see the Defra Code of practice for the sustainable use of soils on construction sites	The effects of onshore infrastructure associated with AyM on agricultural land and soil quality are considered in Section 6.10, Section 6.11 and Section 6.12 of Volume 3 Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). Routing and siting considerations that are discussed in Volume 1, Chapter 4 Site Selection and Alternatives (APP-044). Impacts on best and most versatile land have been minimised where possible through site selection and the adherence to a soil management plan (REP7-022) during both construction works and the reinstatement of the cable corridor following cable installation. The onshore cable corridor and associated works are not expected to have any significant impact on agricultural use given the pre-condition soil survey and soil management plan. The restoration to agricultural use of onshore cable connections for offshore windfarms within this area is demonstrated through the successful restoration of the Burbo Bank Extension GyM cable corridors. The Applicant considered best and most versatile (BMV) land through consideration of ALC grades within the appraisal of 'Land use' when undertaking its BRAG analysis of long-list and short-list options for the onshore ECC and OnSS (see section 4.11 of ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044). The BRAG Analysis included consideration of a number of other environmental and engineering constraints and noting that much of the land to the south-east of Rhyl, and to the north and west of St Asaph Business Park is classed as BMV land and therefore the ability to avoid use of BMV land is limited. Although the onshore infrastructure does not utilize previously developed land, an assessment of the potential for impacts to occur from contamination is provided in Section 6.10, Section 6.11, and Section 6.7.7 of Volume 3, Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). As such AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
	Draft EN-1 5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	The effects of onshore infrastructure associated with AyM on soil, air, water and noise pollution are assessed in the ES and with the mitigation measures proposed, there are no predicted significant effects. AyM is not predicted to result in any instability to land as presented in REP8-062. The relevant River Basin Management Plans have been considered within the WFD Compliance Assessment (REP8-067). The Applicant has also undertaken a detailed site selection process as described within APP-044, factoring in any relevant instability and contamination risks. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.11.16	Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.	
	Draft EN-1 5.11.17	Applicants should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.	
	Draft EN-1 5.11.27	Existing trees and woodlands should be retained wherever possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.	The Applicant has considered the impacts of loss of trees within REP8-061, as well as considering tree cover within its site selection process (APP-044). Where possible, existing trees will be retained and where this is unavoidable, appropriate mitigation and compensation will be agreed with the local authoritiy as outlined in the oLEMP (REP7-026). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.11.34	The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. ~~It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.~~ Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	The effects of onshore infrastructure associated with AyM on agricultural land and soil quality are considered in Section 6.10, Section 6.11 and Section 6.12 of Volume 3 Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). Routing and siting considerations that are discussed in Volume 1, Chapter 4 Site Selection and Alternatives (APP-044). Impacts on best and most versatile land have been minimised where possible through site selection and the adherence to a soil management plan (REP7-022) during both construction works and the reinstatement of the cable corridor following cable installation. The onshore cable corridor and associated works are not expected to have any significant impact on agricultural use given the pre-condition soil survey and soil management plan. The restoration to agricultural use of onshore cable connections for offshore windfarms within this area is demonstrated through the successful restoration of the Burbo Bank Extension and GyM cable corridors.

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			The Applicant considered best and most versatile (BMV) land through consideration of ALC grades within the appraisal of 'Land use' when undertaking its BRAG analysis of long-list and short-list options for the onshore ECC and OnSS (see section 4.11 of ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044). The BRAG Analysis included consideration of a number of other environmental and engineering constraints and noting that much of the land to the south-east of Rhyl, and to the north and west of St Asaph Business Park is classed as BMV land and therefore the ability to avoid use of BMV land is limited. Although the onshore infrastructure does not utilize previously developed land, an assessment of the potential for impacts to occur from contamination is provided in Section 6.10, Section 6.11, and Section 6.7.7 of Volume 3, Chapter 6 of the ES Ground Conditions and Land Use (REP8-062). As such AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-1 5.11.36 and EN-1 5.11.37	When located in the Green Belt, energy infrastructure projects ~~are likely to~~ may comprise 'inappropriate development'. [255] Inappropriate development is by definition harmful to the Green Belt ~~and the general planning policy presumption against it applies with equal force in relation to major energy infrastructure projects. The IPC will need to assess whether there are~~. The NPPF makes clear that most new building is inappropriate in Green Belt and should be refused permission unless in very special circumstances ~~to justify inappropriate development~~. Very special circumstances ~~will~~ are not ~~exist unless the harm by reason of inappropriateness, and any other harm, is outweighed by other considerations. In view of the presumption against inappropriate development, the IPC will attach~~ defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight ~~to the~~ is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources. 255 - Referred to in paragraphs 147-151 of section 13 of the NPPF – https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF _July_2021.pdf	Please see responses to paragraphs 5.10.10 to 5.10.12 of the extant EN-1 (REP8-032) which notes that there is no meaningful interaction with Green Wedge land as a result of AyM which has committed to underground the onshore export cable corridor, notably where in proximity to 'green barriers' which are noted in the Denbighshire adopted Local Development Plan as being between Prestatyn and Rhyl. The undergrounding of cables within the green barrier area may be considered to prevent future potential development in areas which are established *In order to reinforce the separation of neighbouring settlements, and to preserve the character of historic towns.* Whilst not considered 'Green Wedges' the LDP notes that development will only be permitted in 'green barriers' provided that the open character and appearance of the land is not prejudiced. Given AyM will be burying the onshore export cables in these areas AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Noise and Vibration	Draft EN-1 5.12.3	The Welsh Government's overarching policy is set out in its Noise and Soundscape Action Plan 2018 to 2023. [258] Its focus is on creating appropriate soundscapes for communities. This includes not only managing noise but also considering what sounds are appropriate in each time and place. 258 - See https://gov.wales/noise-and-soundscape-action-plan-2018-2023-0	Section 10.3 of Volume 3, Chapter 10 Noise and Vibration (REP8-065) describes how a set of assessment criteria have been developed which has enabled AyM to be assessed against the principal aims of the Noise Policy Statement for England (NPSE) (and Noise and soundscape action plan, 2018, for Wales). The assessment has identified a number of mitigation measures, which are secured through the provision of a Noise and Vibration Management Plan (REP2-020) which will ensure noise and vibration is managed appropriately to avoid significant effect. As such, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
	Draft EN-1 5.12.11	In the marine environment, applicants should consider noise impacts on protected species, both at the individual project level and in-combination with other marine activities.	The Applicant has undertaken an assessment of underwater nose impacts on fish (REP8-057) and marine mammals (REP8-081) both in terms of EIA and HRA (REP8-055), cumulatively and in-combination with other plans, projects and activities. Outline mitigation measures to eliminate injurious effects (including the potential use of noise abatement if deemed necessary at the time) are detailed with the outline MMMP (REP8-069). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	
Socio-Economic Impacts	Draft EN-1 5.13.3	The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	The effects of AyM's construction activity on employment, including tourism are considered in section 3.10 *et seq.* of Volume 3, Chapter 3 Socio-economics (REP8-088). Employment effects associated with O&M activity are assessed in section 3.11. The employment effects during the decommissioning phase are assessed in section 3.12. All relevant socio-economic effects during the construction phase are considered in section 3.10. Effects during the O&M phase are considered in section 3.11. Effects during the decommissioning phase are considered in section 3.12. The chapter concludes that there are no significant adverse effects. The effects on tourism and recreation are addressed under Volume 3, Chapter 4: Tourism and Recreation (APP-065). All relevant socio-economic effects during the construction phase are considered in section 3.10. Effects during the O&M phase are considered in section 3.11 of the ES Chapter. Effects during the decommissioning phase are considered in section 3.12. The chapter concludes that there are no significant adverse effects. Addressed under the cumulative effects section of the Chapter (see section 3.13 of APP-065). The effects of construction activity on tourism are assessed in section 4.10 of the ES Chapter (APP-065). The effects of O&M activity are assessed in section 4.11. The effects of decommissioning on tourism are assessed in section 4.12. In addition, the Applicant has provided details on how it will help to develop the skills needed in the outline Skills and Employment Strategy (REP4-007). A Supply Chain Action Plan will also be required as part of the Contract for Difference (CfD) auction process. As such AyM can be considered

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			to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Traffic and transport	Draft EN-1 5.14.7	~~Where appropriate,~~ The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by ~~public transport, walking and cycling, to~~ active, public and shared transport to: • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; • reduce the need to travel; and • secure behavioural change and modal shift through an offer of genuine modal choice and to mitigate transport impacts.	Section 9.9 of Volume 3, Chapter 9 Traffic and Transport (APP-070) outlines traffic and transport mitigation measures for the construction phase of AyM, such as the Outline Travel Plan (OTP) (Appendix 9 of the Outline CoCP (APP-321)). The OTP will include demand management measures to be adopted. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.14.9 and 5.14.10	If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc) needed to enhance active transport provision. Applicants should discuss with network providers the possibility of co-funding by government for any third-party benefits. Guidance has been issued ~~in England~~ [265] which explains the circumstances where this may be possible, although the government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time. 265 - See https://www.gov.uk/government/publications/transport-investment-strategy, For Wales, refer to the guidance note regarding Transport Grants or any successor to it: see https://gov.wales/sites/default/files/publications/2020-01/local-transport-grants-guidance-2020-to-2021.pdf	No additional transport infrastructure is proposed by the Applicant. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.14.11 and 5.14.12	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips, • locate development in areas already accessible by active travel and public transport, • provide opportunities for shared mobility, • re-mode by shifting travel to a sustainable mode that is more beneficial to the network, • retime travel outside of the known peak times, • reroute to use parts of the network that are less busy	Mitigation measures proposed in Volume 3, Chapter 9 of the ES Traffic and Transport (APP-070) will manage routing and timing of HGV and staff movements and are secured via the Construction Traffic Management Plan under R10 of the dDCO (REP8-118). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
		~~and~~ If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	
	Draft EN-1 5.14.13	Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.[266] 266 - See Future of Freight, DfT, June 2022 at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1085917/future -of-freight-plan.pdf	Routing for HGV movements has been identified, as well as proposed working hours, in order to minimise the impact of AyM on the surrounding highway network. Transportation of Abnormal Indivisible Loads (AILs) will be subject to a separate consenting process, as required. With the mitigation identified in the ES chapter (Outline Construction Traffic Management Plan (REP4-035), Outline PAMP (REP7-024) and Outline Travel Plan (APP-321), the impact on the transport infrastructure is considered to be at acceptable levels with no additional mitigation required. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Resource and Waste Management	Draft EN-1 5.15.6	Applicants must demonstrate that development proposals are in line with Defra's policy position on the role of energy from waste in treating municipal waste.	The Outline Site Waste Management Plan (REP2-035) includes reference to relevant legislation and defines the management responsibilities and procedures that will be in place during the construction phase. The key elements of this plan will be secured in the detailed SWMP which the Applicant will be required to submit to DCC for approval under a requirement of the DCO (REP8-118). A key purpose of the outline SWMP is to minimise the amount of waste disposal from site by aiming to reduce, reuse waste on site or recycle. Offshore, the disposal of dredged material at sea is a subject of the Marine Licence application made to NRW and is considered in the ES. The Dredge and Disposal Site Characterisation (APP-309) considers the alternatives to disposal at sea (such as re-use) and provides justification as to why disposal is necessary. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.15.7	The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW or similar processes for the treatment of waste at a national or local level.	

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
	Draft EN-1 5.15.8 - 5.15.10	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a ~~Site Waste Management Plan. The arrangements described and Management Plan~~ report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities. The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development~~, and~~. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. The applicant is encouraged to refer to the 'Waste Prevention Programme for England' [272] and 'Towards Zero Waste: Our Waste Strategy for Wales' [273] and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome. 272 - See https://www.gov.uk/government/consultations/waste-prevention-programme-for-england-2021 273 - See https://gov.wales/towards-zero-waste-our-waste-strategy	The Outline Site Waste Management Plan (REP2-035) includes reference to relevant legislation and defines the management responsibilities and procedures that will be in place during the construction phase. The key elements of this plan will be secured in the detailed SWMP which the Applicant will be required to submit to DCC for approval under a requirement of the DCO (REP8-118). A key purpose of the outline SWMP is to minimise the amount of waste disposal from site by aiming to reduce, reuse waste on site or recycle. Offshore, the disposal of dredged material at sea is a subject of the Marine Licence application made to NRW and is considered in the ES. The Dredge and Disposal Site Characterisation (APP-309) considers the alternatives to disposal at sea (such as re-use) and provides justification as to why disposal is necessary. The disposal of dredged material at sea is a subject of the Marine Licence application made to NRW and is considered in the ES. The Dredge and Disposal Site Characterisation (APP-309) considers the alternatives to disposal at sea (such as re-use) and provides justification as to why disposal is necessary. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Water Quality and Resources	Draft EN-1 5.16.3	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.2 and 4.9).	Sections 3.10 to 3.14 of Volume 2, Chapter 4 of the ES Marine Water and Sediment Quality (APP-049) present the assessment of AyM on water quality. An assessment of the physical characteristics is presented in Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes (REP8-084). An assessment of fresh water resources and quality is presented in Volume 3, Chapter 7 Hydrology, Hydrogeology and Flood Risk (REP8-063). The conclusions drawn are that there are no significant adverse effects on water quality, water resource and the water environment more broadly, and with regards the WFD assessment there are no effects which are considered significant or non-temporary on water bodies that interact with AyM. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
	Draft EN-1 5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	The Applicant has undertaken engagement with NRW (the relevant licensing and permitting authority) from an early stage of project development. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-1 5.16.7	The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources[277] affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to ~~Catchment Abstraction Management Strategies)~~ Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics~~; and~~ • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects 277 - See the Water Resources planning guideline: See https://www.gov.uk/government/publications/waterresources-planning-guideline/water-resources-planning-guideline	A baseline of the existing water quality for the area which may be affected by the proposed activities is presented in section 3.7 of Volume 2, Chapter 3 Marine Water and Sediment Quality (APP-049). The impacts of the proposed activities on marine water quality are assessed in sections 3.10 to 3.14 of the ES Chapter (APP-049). There will be no proposed changes or new discharges as a result of AyM. A full WFD assessment is presented in Volume 4, Annex 3-1: Water Framework Directive (REP8-067) which details the impacts on coastal and transitional waterbodies and protected areas under WFD. Potential changes to the physical environment, including hydrodynamics, waves and sediment pathways, are presented in Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes (REP8-084). The baseline characteristics of the water environment (which includes water quality, water resources, and flood risk) has been provided in: Environmental assessment during construction, O&M, and decommissioning phase - sections 7.10 - 7.12; and Embedded mitigation - section 7.9 of the Volume 3, Chapter 7, Hydrology, Hydrogeology and Flood Risk (REP8-063). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

2.2 EN-3 NPS Accordance Table

Table 2: NPS EN-3 accordance.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
EN3 Part 2: Assessment and technology-specific information			
Climate Change Adaptation	Draft EN-3 3.4.7	Offshore ~~and onshore wind farms are less likely to be affected by flooding, but~~ wind farms will not be affected by flooding. However, applicants should demonstrate that any necessary land-side infrastructure (such as cabling and onshore substations) will be appropriately resilient to climate-change induced weather phenomena. Similarly, applicants should particularly set out how the proposal would be resilient to storms.	Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes (REP8-084) provides a detailed consideration of the offshore and coastal environment with regards the risks associated with climate change, storms, and changes in coastal morphology. The assessment concludes that there will be no adverse effects associated with the project. The Hydrology, Hydrogeology and Flood Risk chapter of the ES (REP8-063) considers the risk of storm and tidal surges and associated flooding. The Marine Licence Principles document (REP8-014) details a number of documents that will be submitted in advance of construction through reference to the final design and will ensure the long-term resilience of AyM through proposed design measures, such as cable protection and/or burial to withstand storm surges. The documents include provision of a cable specification and installation plan, which will provide detail regarding how the cable will be installed to minimize the risk of exposure that may result from storm damage and coastal processes more broadly. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Consenting process	Draft EN-3 3.8.5	Given ambitions to deliver up to 50 GW of offshore wind by 2030, including up to 5 GW of floating wind, there is a need to speed up, and reduce delays in, the consenting process.	The Applicant welcomes the ambition to speed up the process and reduce delays in the consenting process. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.6	The British Energy Security Strategy sets an ambition to reduce the consenting process to 12 months and establish a fast track consenting route for certain projects where quality standards are met.	
	Draft EN-3 3.8.7	The British Energy Security Strategy also proposes an offshore wind Environmental Improvement Package, including committing to establishing Offshore Wind Environmental Standards (formerly nature-based design standards), required to assist a project's passage through the consenting process. Applicants can find further guidance at paragraphs 2.8.102 of this NPS.	

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The critical national priority for offshore wind	Draft EN-3 3.8.8	As set out in EN-1, more than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology. The security, reliability, climate change, and cost implications of this requires a focus on renewable and other low carbon sources of electricity.	AyM is nationally significant offshore wind infrastructure and as such, its development would assist the government in achieving the stated CNP. As noted in the Planning Statement (REP8-083), AyM is anticipated to provide clean electricity for up to 500,000 homes, and make a substantial contribution to meeting the UK and Wales' renewable energy targets. It is acknowledged that there are unavoidable (but reversible) significant seascape and landscape effects predicted (REP8-082). A landscape enhancement scheme, secured by Requirement 26 of the dDCO (REP8-118) has been agreed with the North Wales local planning authorities and NRW. This provides a significant fund to be used to enhance landscapes within the Isle of Anglesey AONB, Great Orme Heritage Coast and Eryri National Park. There are also anticipated to be potentially significant, temporary adverse impacts on hedgerows and coastal dune invertebrates at a county level in the short term until the proposed mitigation is sufficiently mature and has become established. However, all predicted significant effects have been mitigated as far as practicable and, when taken as a whole, there are no adverse effects, individually or cumulatively, that would be sufficient to outweigh the substantial benefits of, and urgent need for new offshore wind capacity as CNP. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.9	The UK's resources, with its shallow seabeds and high winds, offer unique advantages that have made the country a global leader in offshore wind and pioneers of floating wind.	
	Draft EN-3 3.8.10	In addition, along with strong public support for offshore projects27, the cost of offshore wind power has fallen dramatically. Offshore wind prices in the Round 4 Contracts for Difference auctions were around 65% less than those achieved in the first allocation round in 2015, making offshore wind one of the lowest cost ways of generating electricity.	
	Draft EN-3 3.8.11	With smarter planning the UK can maintain high environmental standards and minimise impacts while increasing the levels of deployment needed to meet our 2030 ambitions and net zero.	
	Draft EN-3 3.8.12	Therefore, Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant new offshore wind development and supporting onshore and offshore network infrastructure and related network reinforcements ("CNP Infrastructure").	
	Draft EN-3 3.8.13	Applicants for CNP infrastructure must continue to show how their application meets the requirements in EN-1 and this NPS, applying the mitigation hierarchy, as well as any other legal[28] and regulatory requirements. Where an applicant has done so and there are residual impacts the following policy will apply. 28 - The Secretary of State will continue to comply with any legislative requirements, such as those contained in regulations 3 and 7 of the Infrastructure Planning (Decisions) Regulations 2010, section 40 of the Natural Environment and Rural Communities Act 2006 and section 6 of the Environment (Wales) Act 2016 and section 126 of the Marine and Coastal Access Act 2009.	
	Draft EN-3 3.8.14	Where there are residual non-HRA impacts, of any sort other than those that present an unacceptable risk to, or unacceptable interference with, human health, national defence or navigation, these are unlikely, in all but the most exceptional cases, to outweigh the urgent need for this type of infrastructure and are therefore unlikely to result in an application being refused.	
	Draft EN-3 3.8.15	As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any test	

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		requiring a clear outweighing of harm, exceptionality, or very special circumstances within EN-1, this NPS or any other planning policy.	
	Draft EN-3 3.8.16	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: ▲ where development within a Green Belt requires very special circumstances to justify development; ▲ where development within or near a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh the harm; ▲ where development affecting irreplaceable habitats requires the benefits (including need) to clearly outweigh the harm. Where development is, exceptionally, necessary in coastal change areas, flood risk areas or where an increase in flood risk elsewhere cannot be avoided or mitigated; ▲ where development in nationally designated landscapes requires exceptional circumstances; and ▲ where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	
	Draft EN-3 3.8.17	Any HRA residual impacts will continue to be considered under the framework set out in the Habitats Regulations.	
Applicant assessment - Factors influencing site selection and design	Draft EN-3 3.8.25	In proposing sites for offshore wind, NSIP applicants should demonstrate that their choice of site takes into account the government's Offshore Energy SEA 4[31] and any successors to it. 31 - Applicants should note that the Offshore Energy SEA 4 consultation was published before the British Energy Security Strategy and does not reflect the current 50GW by 2030 ambition. The spatial analysis indicated space for further generation capacity beyond the 40GW initially considered. See https://www.gov.uk/government/consultations/uk-offshore-energy-strategic-environmentalassessment-4-oesea4	AyM falls under the requirements for extension projects, and was subject to the plan level HRA process, following which AyM was included in the '2017 Extension Round'. It is important to note that, as a result of the requirements of the 2017 Extensions round, there are limitations with regards the possible siting of Extension projects; this is recognised in the 2021 draft NPS EN-3. Notwithstanding this, the project has undertaken a design process that goes as far as practicable to develop a design that seeks to minimise harm/ change to the receiving environment and this is reflected in the iterative process that has been applied to the scheme throughout the pre-application process. The Offshore Energy SEA has been referred to to inform the understanding of the receiving environment, and likely industry impacts. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

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	Draft EN-3 3.8.57	Given the scale of offshore wind deployment required to meet 2030 and 2050 ambitions, and the importance of the UK Continental Shelf (UKCS) in supporting progress towards net zero commitments there will be increasing demand on the UKCS which could give rise to conflicts. The occurrence of conflict between offshore development projects in the short term could restrict the capacity of the UKCS to support the variety of technologies required for the delivery of net zero.	The Applicant has fully engaged with The Crown Estate (TCE) through its application for an extension to the operational GyM offshore wind farm as part of the TCE's 2017 Extensions leasing round. Through TCE's siting criteria and its own pre-application consultation and engagement, the Applicant has sought to minimise the effect of its proposal on other offshore infrastructure and where interaction is unavoidable to ensure that measures will be in appropriately place through the DCO to manage such interactions. As such the proposed development is in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.58	Applicants should consult the Government's Marine Plans (further detailed in Section 4.4 of EN-1) which are a useful information source of existing activities and infrastructure.	
	Draft EN-3 3.8.60	Applicants are encouraged to work collaboratively with those other developers and sea users on co-existence/co-location opportunities, shared mitigation, compensation and monitoring where appropriate. Where applicable, the creation of statements of common ground between developers is recommended. Work is ongoing between government and industry to support effective collaboration and find solutions to facilitate to greater co-existence/co-location.	
	Draft EN-3 3.8.64	Given the scale of offshore wind deployment required to meet 2030 and 2050 ambitions, applicants will need to give close consideration to impacts on MPAs, either alone or in combination, in addition to mitigation measures and/or compensation (both individually and in combination with other plans or projects) which may be needed to approve their projects.	The Applicant has proposed a number of mitigation measures, mitigation measures in the Schedule of Mitigation and Monitoring (REP8-016) and Marine Licence Principles (REP8-014) submissions. The mitigation measures have been noted by NRW in their Deadline 5 submission (REP5-039) as acceptable, with all ecological mitigation having been noted as appropriate. For example, NRW specifically note that they are in agreement with the potential mitigation measures proposed and as outlined in the Marine Mammal Mitigation Protocol (MMMP). Furthermore, the Applicant and NRW are in agreement, as noted in NRW's Deadline 5 submission (REP5-039), that a vessel management plan will be submitted post-consent and implemented to ensure appropriate routing measures are taken to avoid adverse effects on red throated diver, a designated feature of the Liverpool Bay SPA. As such the proposed development is in accordance with the draft NPS and the Secretary of State may place significant weight on the proposed development having no adverse effects on designated sites.
	Draft EN-3 3.8.65	It is likely that these may include proactive measures to reduce the impact of deployment e.g., micrositing of cable routes to avoid vulnerable habitats, alternatives piling or trenching techniques, noise abatement technology, collision avoidance methods, or compensation for habitat loss. See Section 2.8.103 for Offshore Wind Environmental Standards.	
	Draft EN-3 3.8.68	Applicants are expected to seek advice from SNCBs and Defra on potential mitigation and/or compensation requirements at the earliest opportunity and comply with future statutory requirements and/or guidance once available.	
	Draft EN-3 3.8.69	Applicants will also be able to facilitate delivery of strategic compensation measures where appropriate.	
Applicant assessment -	Draft EN-3 3.8.74	For many wind farm projects, including those from The Crown Estate Leasing Round 4 onwards, connection agreements will be limited to connection	Assessment of the potential effects on subtidal ecology and disturbance during cable installation and removal, as well as

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Technical considerations		points proposed through strategic network design exercises such as those undertaken by the National Grid Electricity System Operator, including the Holistic Network Design for offshore-onshore transmission under the OTNR. Please see section 2.7 and 2.8 of EN-5 for further details on strategic network designs.	expected rates of recovery, are set out in Volume 2, Chapter 5 Benthic, Subtidal and Intertidal Ecology (APP-051). This includes consideration of the effects of jack-up barge legs and vessel anchor spreads, as described in the Project Description (Offshore) ES Chapter (APP-047). The AyM assessment has considered the effects of benthic and intertidal disturbances throughout the whole of the development (sections 5.10 - 5.12 of APP-051), with specific reference to construction vessels and anchors in paragraph 122 *et seq.* and habitat disturbance within the intertidal zone in paragraph 171 *et seq*. of APP-051. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.75	Transmission cabling from offshore energy infrastructure can negatively impact (both during installation and over their lifetime) seabed habitats and protected sites.	
	Draft EN-3 3.8.76	Greater coordination of offshore-onshore transmission infrastructure is important to help lessen the overall impact.	
	Draft EN-3 3.8.78	Early planning can help avoid the location of either windfarm or transmission infrastructure pushing the other into areas where environmental impacts could be increased.	
	Draft EN-3 3.8.79	The location of arrays and transmission infrastructure should be assessed strategically (especially where they are not covered by the same consent or marine licence) and the mitigation hierarchy should be used to address any environmental impact.	
	Draft EN-3 3.8.84	Applicants are expected to demonstrate compliance with mitigation measures identified by The Crown Estate in any plan-level HRA produced as part of its leasing rounds and with any future statutory requirements, guidance or mitigation measures developed to deliver the commitments in the British Energy Security Strategy, including on Offshore Wind Environmental Standards.	In 2017, The Crown Estate defined application criteria for offshore wind project extensions. Whilst not specifically 'site selection policy' it is clear that the criteria form critical components in the site selection process for AyM and this is also reflected in the draft NPS EN-3. The process, and how the Applicant has sought to fulfil them, is presented in the Site Selection and Alternatives ES Chapter (APP-044). The 2017 Extension Round criteria, which were also used to inform a strategic plan-level HRA, limit the spatial opportunity to extend the existing wind farm. For the reasons set out below the opportunity to extend the wind farm and realise the recognised wind energy potential at the site, exists only to the west of the operating GyM wind farm. The Site Selection and Alternatives Chapter tabulates the 2017 Extension Round criteria and provides a detailed account of the Applicant's compliance with them. Of note is the second of the criteria which requires a proposed extension project to share a boundary with the existing wind farm; AyM meets this criterion by sharing its eastern boundary with the GyM project.

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			As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.90	To inform micrositing/microrouting applicants should undertake highresolution survey work and make provision for investigative work, such as archaeological examination, to assess the impacts of any proposed cables or foundation placement on potential archaeological assets.	Section 1.6 of the offshore Project Description Chapter (APP-047) outlines that micrositing will be required and will be informed by pre-construction surveys to be undertaken to determine the final locations of infrastructure in order to provide flexibility to accommodate to unforeseen events. As such the proposed development is in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.91	Applicants should submit an outline archaeological Written Scheme of Investigation (WSI) as part of the DCO submission, with a commitment to complete a project-specific WSI post-consent in consultation with Historic England.	Outline proposals for archaeological mitigation are set out in an overarching written scheme of investigation (WSI) (APP-147) to be agreed with CPAT with WSIs to be produced for each project component (i.e. onshore cable sections and/or OnSS) where required. As such the proposed development is in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.100	Where appropriate, applicants are also encouraged to consider monitoring collaboratively with other developers and sea users. Work is ongoing between government and industry to support effective collaboration.	By virtue of the Crown Estate 2017 Extensions Round, and the proposed development not having any adverse effects on designated sites, collaborative mitigation, compensation and/or monitoring is not considered to be necessary. As such the proposed development is in accordance with this provision of the draft NPS.
Applicant assessment – Impacts - Biodiversity and ecological conservation	Draft EN-3 3.8.117	Applicants should assess the potential of their proposed development to have net positive effects on marine ecology and biodiversity, as well as negative effects.	Volume 2 of the ES, and the associated technical chapters consider in detail the potential impacts associated with AyM. With regards marine ecology and biodiversity the potential positive and negative effects are considered in Chapters 3 Marine Water and Sediment Quality (APP-049), Chapter 4 Offshore Ornithology (REP8-085), Chapter 5 Benthic Subtidal and Intertidal Ecology (APP-051), Chapter 6 Fish and Shellfish Ecology REP8-057), and Chapter 7 Marine Mammals (REP8-081). The assessments conclude that no likely significant adverse effects are predicted to occur as a result of the construction of AyM; these conclusions extend to the findings of the RIAA on international designated sites (REP8-055).

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			In the development of the Marine Licence Principles (REP8-014) which has reached broad agreement with NRW, the Applicant has had due consideration to the relevant guidance. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.124	The British Energy Security Strategy commits to reviewing the Habitats Regulation Assessment process for offshore wind farm developments and powers have been sought through the Energy Bill to implement this through secondary legislation. Further guidance will be published as a separate document setting out what information assessments must contain. Once final guidance is published applicants will be expected to comply	AyM has been considered against the four-staged approach to the Habitats Regulations Assessment (HRA) process, in line with PINS Advice Note 10: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects (2017). It is noted that The RIAA (REP8-055) has not identified any Adverse Effects on Integrity (AEoI) on the conservation objectives of any sites designated as part of the UK National Site Network and therefore the HRA process has not progressed beyond Stage 2 (Appropriate Assessment). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Impacts - Marine Mammals	Draft EN-3 3.8.148	The applicant should develop a Site Integrity Plan (SIP) to allow the cumulative impacts of underwater noise to be reviewed closer to the construction date, when there is more certainty in other plans and projects.	The Applicant has not identified the potential for cumulative or in-combination effects in relation to marine mammals and therefore it has not been deemed necessary to develop a SIP. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Impacts - Birds	Draft EN-3 3.8.154	Applicants are encouraged to make appropriate applications for amendments to development consent to secure reduced parameters and ornithological impacts.	The Applicant notes the proposal with regard to the 'as built' parameters and considers that the need for such a provision will be a matter for SoS in the final DCO and consent decision.
Applicant assessment – Impacts - Subtidal habitats and species	Draft EN-3 3.8.164	Applicants should follow guidelines for leasing transmission assets infrastructures, and any successor to it produced by the Crown Estate.[53] 53 - https://www.thecrownestate.co.uk/media/3994/the-crown-estate-cable-route-identification-leasingguidelines.pdf	The Applicant has followed the Crown Estate cable routing protocol. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Impacts - Commercial	Draft EN-3 3.8.169	Applicants should consider guidance on best practice for fisheries liaison, which has been jointly agreed by the renewables industry and fishing community. [54]	A Fisheries Liaison and Co-Existence Plan (REP1-033) is proposed which seeks to ensure fishing activities can continue in the longer-term following construction (and during construction, subject to advisory working areas/safety areas).

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fisheries and fishing		54 - See https://www.thecrownestate.co.uk/en-gb/what-we-do/on-the-seabed/our-partnerships/thefishing-liaison-with-offshore-wind-and-wet-renewables-group/	As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.173	Applicants will be expected to undertake dialogue with the fishing industry during the planning and design of individual offshore wind farm proposals to maximise the potential for co-existence/co-location and reduce potential displacement.	Consultation with representatives of the fishing industry, including the relevant fisheries groups, commenced in advance of scoping, with the Applicant having an established relationship with the fishing community within the region including. Consultation continued throughout the scoping, PEIR, and application process, and will be ongoing through the construction and post-construction phases following successful consent. Engagement is summarised in Section 8.3 of Volume 2, Chapter 9 Commercial Fisheries (REP8-086). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted
Applicant assessment – Impacts - Marine historic environment	Draft EN-3 3.8.187	Whilst it might be possible for a development project to avoid designated heritage assets, the knowledge currently available about the historic environment in the inshore and offshore areas is limited .	These potential effects to heritage assets in the physical marine environment have been assessed in sections 11.11 - 11.14 of Volume 2, Chapter 11 Offshore Archaeology and Cultural Heritage (REP8-058). In order to address potential adverse effects, mitigation measures have been designed to protect any marine archaeological receptors of interest. With the implementation of the mitigation measures all effects should be reduced to minor negative significance or minor to moderate beneficial significance (see sections 11.11 – 11.14 of Volume 2, Chapter 11 Offshore Archaeology and Cultural Heritage (REP8-058), with a summary provided in Table 12). Avoidance will be achieved through the recommendation of AEZs, as outlined in the mitigation measures. The AEZs have been designed to protect any marine archaeological receptors of interest (see section 11.10 of Volume 2, Chapter 11 Offshore Archaeology and Cultural Heritage (REP8-058), with Table 9). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.188	Applicants are required to determine how any known heritage assets might best be avoided.	
	Draft EN-3 3.8.189	The applicant will be expected to conduct all necessary examination and assessment exercises using a variety of survey techniques to plan the development so as to optimise opportunities for avoidance.	
	Draft EN-3 3.8.190	Once a site has been chosen, it may be necessary to undertake further archaeological assessment, including field evaluation, to identify as yet unknown heritage assets when considering the options for detailed site development, which may also include ancillary matters, such as those described in Section 5.9 of EN-1.	
Applicant assessment – Impacts -	Draft EN-3 3.8.200	Engagement should seek solutions that allow offshore wind farms to successfully co-exist with navigation and shipping uses of the sea.	Section 9.3 of Volume 2, Chapter 10 Shipping and Navigation (APP-055) summarises key issues raised during consultation specific to shipping and navigation.

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Navigation and shipping			Full details of consultation undertaken are provided in the NRA (Volume 4, Annex 9.1 (APP-111)), with a summary of key points given in Section 9.3 of Volume 2, Chapter 10 Shipping and Navigation (APP-055). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Impacts - Other offshore infrastructure and activities	Draft EN-3 3.8.215	Applicants should use marine plans (paragraph 2.8.27 of this NPS and Section 4.4 of EN-1) in considering which activities may be most affected by their proposal and thus where to target their assessment.	AyM has been designed to avoid or minimise effects on infrastructure and other users of the marine environment. Embedded mitigation is described in Table 11 of Volume 2, Chapter 12 Other Marine Users and Activities (APP-058). With consideration of the mitigation measures in place, no significant adverse effects are predicted to occur. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Impacts - Seascape and visual effects	Draft EN-3 3.8.224	Where a proposed offshore wind farm will be visible from the shore and would be within the setting of a nationally designated landscape with potential effects on the area's statutory purpose, a~~n~~ seascape, landscape and visual impact assessment (SLVIA[63]) should be undertaken ~~which is~~ in accordance with the relevant offshore wind farm EIA policy and the latest Offshore Energy SEA, including the White 2020 report.[64] The SLVIA should be proportionate to the scale of the potential impacts. ~~Impact on seascape should be addressed in addition to the landscape and visual effects discussed in EN-1.~~ This will always be the case where a coastal National Park, the Broads or AONB, or a Heritage Coast or their setting is potentially affected. 63 - Seascape, Landscape and Visual Impact Assessment. See Landscape Institute Guidelines for Landscape and Visual impact Assessment Edition 3 64 - See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896084/White_Consultants_2020_Seascape_and_visual_buffer_study_for_offshore_wind_farms.pdf	An SLVIA has been undertaken as presented in Volume 2, Chapter 10 Seascape, Landscape and Visual Impact Assessment (REP8-082) of the ES. The scope of assessment, maximum design scenarios, and preferred boundary for assessment was determined in consultation with the SLVIA technical group as part of the Evidence Plan process (APP-301). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted. The Applicant submitted REP5-007 in consideration of the policy tests relevant to designated landscapes, which sets out how the Applicant has sought to avoid compromising the statutory purpose of designated landscapes. With regard to the limited significant effects identified on the Anglesey AONB and Eryri National Park, the Applicant has proposed enhancements measures (see REP8-123) to offset these potential effects. The Applicant considers that substantial weight should be placed on these measures by the SoS as outlined in document REP8-038.
Applicant assessment – Mitigation	Draft EN-3 3.8.229	Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting HRA sites and/or MCZs. It is essential that applicants involve SNCBs and Defra as early as	The Applicant has proposed a number of mitigation measures, mitigation measures in the Schedule of Mitigation and Monitoring (REP8-016) and Marine Licence Principles (REP8-014) submissions. The mitigation measures have been noted by NRW in their

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		possible in the planning process to enable discussions of what is and isn't a significant and/or adverse effect, subsequent implications, and if required, mitigation and/or compensation.	Deadline 5 submission (REP5-039) as acceptable, with all ecological mitigation having been noted as appropriate. For example NRW specifically note that they are in agreement with the potential mitigation measures proposed and as outlined in the Marine Mammal Mitigation Protocol (MMMP). Furthermore, the Applicant and NRW are in agreement, as noted in NRW's Deadline 5 submission (REP5-039), that a vessel management plan will be submitted post-consent and implemented to ensure appropriate routing measures are taken to avoid adverse effects on red throated diver, a designated feature of the Liverpool Bay SPA. As such the proposed development is in accordance with the draft NPS and the Secretary of State may place significant weight on the proposed development having no adverse effects on designated sites.
	Draft EN-3 3.8.230	At the earliest possible stage alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology.	
	Draft EN-3 3.8.231	Only once all feasible alternatives and mitigation measures have been employed, should applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity.	
	Draft EN-3 3.8.232	Where several developers are likely to have cumulative impacts on the same species or feature it may be appropriate to collaborate on mitigation and compensation measures. (see paragraphs 2.8.282 below for further guidance on compensation).	The Applicant has provided a detailed consideration of the potential effects on MPAs and has concluded that there will be no adverse effects on any site, either alone or in-combination with other projects or plans. The conclusions drawn have been subject to detailed consultation, and the relevant regulators have note agreement with the conclusions, NRW in particular noting at Deadline 5 (REP5-039) that they agree there will be no adverse effects, either alone or in-combination, on for example ornithological sites. A number of mitigation measures have been proposed, and secured within the proposed DCO (REP8-118) and Schedule of Mitigation and Monitoring (REP4-021), the detail of which has been agreed with NRW, and the implementation of which will ensure that there are no adverse effects on designated sites. As such the proposed development is in accordance with this draft NPS provision insofar as the drafting remains as currently drafted, and the Secretary of State can place significant weight on the proposed development having no adverse significant effects on any designated sites.
Applicant assessment – Mitigation - Biodiversity and	Draft EN-3 3.8.233	Mitigation will be possible in the form of careful design of the development itself and the construction techniques employed.	Volume 2 of the ES, and the associated technical chapters consider in detail the potential impacts associated with AyM. With regards marine ecology and biodiversity various mitigation measures are proposed to be implemented as a result of the assessments presented in Chapters 3 Marine Water and Sediment

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ecological conservation			Quality (APP-049), Chapter 4 Offshore Ornithology (REP8-085), Chapter 5 Benthic Subtidal and Intertidal Ecology (APP-051), chapter 6 Fish and Shellfish Ecology (REP8-057), and Chapter 7 Marine Mammals (REP8-081). The mitigation proposed includes micrositing around sensitive benthic receptors (subject to the findings of pre-construction surveys), and underwater noise management such as piling management measures including soft start measures to mitigate the potential impacts on fish and shellfish and marine mammals. Where considered appropriate, and where effects associated with the project may be considered significant in the absence of mitigation, mitigation has been considered during the AyM assessment and is recorded in the Schedule of Mitigation and Monitoring and secured in the Marine Licence Principals documents, or dDCO Requirements (REP8-014 and REP8-118, respectively). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Mitigation - Physical environment	Draft EN-3 3.8.239 and 3.8.240	~~Mitigation measures which the IPC should expect the applicants to have considered include~~ Applicants are expected to have considered the best ecological outcomes in terms of potential mitigation. These might include: • avoidance of areas sensitive to physical effects; • consideration of micro-siting of both the array and cables; • alignment and density of the array; • design of foundations; • ensuring that sediment moved is retained as locally as possible; • the burying of cables to a necessary depth ~~and~~; • using scour protection techniques around offshore structures to prevent scour effects ~~around them.~~ or designing turbines to withstand scour, so scour protection is not required or is minimised. Applicants should consult the statutory consultees on appropriate mitigation and monitoring.	Embedded mitigation relating to cable burial and scour are set out in section 2.9 of Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes (REP8-084) which makes reference to the requirement to produce a cable burial risk assessment (subject to this requirement being a condition of a Marine Licence). Use of scour protection and methods of cable protection are set out in Volume 2, Chapter 1 Offshore Project Description (APP-047) as assessed throughout Volume 2 (Offshore) of the ES. Consultation has been undertaken and is ongoing with statutory consultees and other interested parties. The mitigation measures relating to cable burial and scour are set out in Table 8 of Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes (REP8-084). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment –	Draft EN-3 3.8.242	Applicants should undertake a review of up-to-date research and all potential avoidance, reduction and mitigation options presented.	Cable installation methods have been considered and assessed as part of the EIA. Effects on the intertidal habitat have been

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
Mitigation - Intertidal and coastal habitats and species	Draft EN-3 3.8.244	Where applicable, use of horizontal directional drilling techniques (HDD) should be considered as a method to avoid impacts on sensitive habitats and species.	assessed within Volume 2, Chapter 5 Benthic Subtidal and Intertidal Ecology (APP-051) and throughout the EIA. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.245	Where HDD is proposed, the applicant should provide an alternative plan for installing the infrastructure in the event that HDD fails.	
	Draft EN-3 3.8.246	The applicant should explain their justification for the alternative plan and ensure this is the least impactful method possible.	
	Draft EN-3 3.8.248	It is expected that a more co-ordinated approach to offshore-onshore transmission will be delivered. See paragraphs 2.8.46 of this NPS.	Volume 2, Chapter 5 Benthic Subtidal and Intertidal Ecology (APP-051) includes an assessment of the cumulative effects that may occur as a result of AyM. The applicant has considered the ability to coordinate with other developers and minimize disturbance, however the majority of the projects are already in situ or AyMs have insufficient confidence on timelines to facilitate a meaningful process of coordination. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Mitigation - Subtidal habitats and species	Draft EN-3 3.8.253	It is expected that a more co-ordinated approach to offshore-onshore transmission will be delivered going forward. See paragraphs 2.8.46 of this NPS.	
Applicant assessment – Mitigation - Marine Mammals	Draft EN-3 3.8.256	Applicants should undertake a review of up-to-date research and all potential mitigation options presented as part of the application, having consulted the relevant JNCC mitigation guidelines[66]	The Applicant has proposed a number of mitigation measures in the Schedule of Mitigation and Monitoring (REP8-016) and Marine Licence Principles (REP8-014) submissions. The mitigation measures have been noted by NRW in their Deadline 5 submission (REP5-039) as acceptable, with all ecological mitigation having been noted as appropriate. For example NRW specifically note that they have no issues with the potential mitigation measures proposed and as outlined in the Marine Mammal Mitigation Protocol (MMMP) (APP-107). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Mitigation - Birds	Draft EN-3 3.8.260	The exact timing of peak migration events is inherently uncertain~~. Therefore, shutting down turbines within migration routes during~~, although research is ongoing into estimate~~d~~ for peak migration periods ~~is unlikely to offer suitable mitigation~~ for a number of bird species and detection technologies (e.g. using radar and integrated sensors) are improving.	Mitigation measures for offshore ornithology have been considered within the AyM assessment process where relevant (Section 4.7 of Volume 2, Chapter 4 Offshore Ornithology (APP-050)). Additional risks with regards to migratory movements are further considered within Volume 4, Annex: 4.4 Migratory Collision

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
	Draft EN-3 3.8.261	Currently, shutting down turbines within migration routes during estimated peak migration periods is unlikely to offer suitable mitigation, but this might be a possibility in the future.	Risk Modelling (APP-098) and assessed in Section 4.12 of Volume 2, Chapter 4 Offshore Ornithology (REP8-085). As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Mitigation - Fish	Draft EN-3 3.8.262	Applicants should undertake a review of up-to-date research and present all potential mitigation options as part of their proposal.	EMF effects are considered within the AyM assessment (see section 6.11.4 *et seq*. of ES Volume 2, Chapter 6: Fish and Shellfish Ecology (REP8-057)). The assessment of potential EMF for AyM has been informed by available scientific literature and site-specific monitoring undertaken following the installation of the export cable corridor for the GyM project. The assessment conclusions are supported by the EMF monitoring undertaken for the GyM project, which concluded that there is no significant effect predicted as a result of AyM. This conclusion was drawn immaterial of specific burial depth, however the proposed AyM development has committed to either burial of cable or installation of appropriate cable protection, as described in section 6.11.4 of REP8-057. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-3 3.8.265	It is unknown whether exposure to multiple cables and larger capacity cables may have a cumulative impact on sensitive species. It is therefore important to monitor EMF emissions which may provide the evidence to inform future EIAs.	
Applicant assessment – Mitigation - Marine historic environment	Draft EN-3 3.8.273	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	Micro-siting is recommended in the mitigation measures, that have been designed to protect any marine archaeological receptors of interest. Section 11.10 of Volume 2, Chapter 11 Offshore Archaeology and Cultural Heritage (REP8-058) provides information about micro-siting, and paragraph 10 of the Chapter provides information about the ORPAD, to manage unexpected discoveries. As such AyM can be considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Applicant assessment – Compensatory measures	Draft EN-3 3.8.282	With increasing deployment of offshore wind farms, cumulative environmental impacts upon HRA sites and MCZs may not be addressed by avoidance, reduction, or mitigation alone, therefore compensatory measures may be required where adverse effects on site integrity and/or on conservation objectives cannot be ruled out.	The Applicant has provided a detailed consideration of the potential effects on MPAs and has concluded that there will be no adverse effects on any site, either alone or in-combination with other projects or plans. The conclusions drawn have been subject to detailed consultation, and the relevant regulators have note agreement with the conclusions, NRW in particular noting at Deadline 5 (REP5-039) that they agree there will be no adverse
	Draft EN-3 3.8.284	If, during the pre-application stage, SNCBs indicate that the proposed development is likely to adversely impact a protected site, the applicant	

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
		should include with their application such information as may reasonably be required to assess potential derogations under the Habitats Regulations or the Marine and Coastal Access Act 2009.	effects, either alone or in-combination, on for example ornithological sites. A number of mitigation measures have been proposed, and secured within the proposed DCO (REP8-118) and Schedule of Mitigation and Monitoring (REP4-021), the detail of which has been agreed with NRW, and the implementation of which will ensure that there are no adverse effects on designated sites. As such the proposed development is in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted, and the Secretary of State can place significant weight on the proposed development having no adverse significant effects on any designated sites.
	Draft EN-3 3.8.286	This information includes: ▲ assessment of alternative solutions, showing the relevant tests on alternatives have been met; ▲ a case showing that the relevant tests for IROPI or Measures of Equivalent Environmental Benefit have been met; and ▲ appropriate securable environmental compensation	
	Draft EN-3 3.8.287	Provision of such information will not be taken as an acceptance of adverse impacts and if applicants dispute the likelihood of adverse effects, they can provide this information as part of their application, 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development.	
	Draft EN-3 3.8.290	Applicants should work closely at an early stage in the pre-application process with SNCBs, and Defra, to develop a compensation plan for all protected sites adversely affected by the development.	
	Draft EN-3 3.8.291	Before submitting an application, applicants should seek the views of the SNCB and Defra Secretary of State, as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site.	
	Draft EN-3 3.8.292	In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority and Secretary of State.	
Secretary of State decision making - Technical considerations	Draft EN-3 3.8.306	The Secretary of State should assess the offshore-onshore element(s) of the grid connection (e.g. electric lines, substations) in accordance with the guidelines and requirements contained in EN-5.	Please refer to the Applicant's EN-5 accordance table below, within REP8-032 and within REP8-030 which confirms that AyM can be considered to be in accordance with paragraph 3.8.306 of EN-3. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Secretary of State decision making – Impacts -	Draft EN-3 3.8.323	Where adverse effects on site integrity/conservation objectives are predicted the Secretary of State should consider the extent to which the effects are temporary or reversible, and the timescales for recovery.	The Applicant has provided a detailed consideration of the potential effects on MPAs and has concluded that there will be no adverse effects on any site, either alone or in-combination with other projects or plans. The conclusions drawn have been subject

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
Biodiversity and ecological conservation			to detailed consultation, and the relevant regulators have note agreement with the conclusions, NRW in particular noting at Deadline 5 (REP5-039) that they agree there will be no adverse effects, either alone or in-combination, on for example ornithological sites. A number of mitigation measures have been proposed, and secured within the proposed DCO (REP8-118) and Schedule of Mitigation and Monitoring (REP8-016), the detail of which has been agreed with NRW, and the implementation of which will ensure that there are no adverse effects on designated sites. As such the proposed development is in accordance with this draft NPS provision, and the Secretary of State can place significant weight on the proposed development having no adverse significant effects on any designated sites.
Secretary of State decision making – Impacts - Fish	Draft EN-3 3.8.328	The use of external cable protection has been suggested as a mitigation for EMF (by increasing the distance between fish species and individual cables). However, the Secretary of State should also consider any negative impacts from external cable protection on benthic habitats, and a balance between protection of various receptors must be made, with all mitigation and alternatives reviewed.	As noted in response to Draft paragraph EN-3 3.8.262, the Applicant has provided a detailed consideration of the potential effects of EMF through reference to the best available evidence and site-specific monitoring data. The Applicant has also considered the potential implications of cable protection material on benthic habitats. As such the proposed development can be considered in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Secretary of State decision making – Impacts - Seascape and visual effects	Draft EN-3 3.8.369	Where a proposed offshore wind farm is within sight of the coast, there may be adverse effects. The Secretary of State should not refuse to grant consent for a development solely on the ground of an adverse effect on the seascape or visual amenity unless: ▲ it considers that an alternative layout within the identified site could be reasonably proposed which would minimise any harm, taking into account other constraints that the applicant has faced such as ecological effects, while maintaining safety or economic viability of the application; or ▲ it takes ~~taking~~ account of the sensitivity of the receptor(s) ~~as set out in EN-1 12 paragraph 5.9.18,~~ and impacts on the statutory purposes of designated landscapes as set out in Section 5.10 of EN-1; the harmful effects are considered to outweigh the benefits of the proposed scheme. See also Critical National Priority (Section 2.8.8 of EN3).	With respect to the array area the array boundary has progressively and iteratively been reduced in response to feedback received during the EIA Scoping, through the Evidence Plan Process (APP-301), and PEIR consultation, from an overall area of 107 km^2 during Scoping to 88 km^2 in the PEIR, and 78 km^2 for the final application design; a total reduction of 27%. The useable array area is already less than that of GyM, which is considered to be a densely packed array (at 8.5 MW/km^2) when compared with more recently built and designed projects the Applicant has involvement in (Triton Knoll at 5.93 MW/km^2 and Sofia at 2.54 MW/km^2) (APP-044). In addition, in order to compete successfully in a Contract for Difference auction rounds (CfD ARs), and therefore be deliverable, a project must strive to keep the Levelised Cost of Energy (LCoE) down in order be competitive with other projects. A low LCoE is based on a number of different factors, but the scale

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
			of the project is a critical variable as it drives economies of scale, and the density of a project is a key variable as it drives energy yield. AyM is already at the lower end of project size and upper end of site density than many competing projects (based on the Applicant's predictions of other projects that may compete in the same CfD as AyM) so a large reduction in area would drive significant changes in both project size or array density (or both) and therefore in LCoE, likely making the project economically unviable (see also Applicant's response to ExQ1.17.5 in REP1-007). With respect to individual WTG sizes, the Applicant has set out the rationale for the size of individual turbines in the WTG Size Technical Note (APP-299). The size of individual turbines has increased over time, and smaller models, such as those used for GyM, Rhyl Flats and North Hoyle, are no longer available on the market. The WTG sizes (in terms of rotor diameter and maximum tip height) that are described in MDS A and MDS B represent the Applicant's view on the anticipated range of size of WTGs that will be available in the timeframe that AyM will be delivered. The SLVIA Chapter (REP8-082) and LVIA Chapter (REP8-087) assess the landscape impacts of AyM (during construction, decommissioning and operation). Volume 1 Chapter 4 'Site Selection and Alternatives' (APP-044) of the ES sets out the need for renewable energy (paragraphs 11 to 34) and the benefits of offshore wind (paragraphs 35 to 37). This is furthered by paragraphs 101 to 129 of the Planning Statement (REP8-083). In this context, AyM would make a substantial contribution towards the delivery of renewable energy in line with the need to significantly decarbonise the power section by 2030 and should therefore be ascribed substantial weight in the balance of considerations and the presumption in favour of such developments. These benefits are considered to outweigh any harmful effects identified. Therefore, AyM is considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.

2.3 EN-5 NPS Accordance Table

Table 3: NPS EN-5 accordance.

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
EN-5 Part 1: Introduction			
Background	Draft EN-5 1.1.2	The government has an ambition to deploy up to 50GW of offshore wind capacity (including up to 5GW floating wind) by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net-zero by 2050.	AyM is nationally significant offshore wind infrastructure and as such, its development would assist the government in achieving the stated CNP. As noted in the Planning Statement (REP8-083), AyM is anticipated to provide clean electricity for up to 500,000 homes, and make a substantial contribution to meeting the UK and Wales' renewable energy targets. As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-5 1.1.4	As identified in EN-3, offshore wind development, and the supporting onshore and offshore transmission infrastructure and related network reinforcements, are viewed by the government as being a critical national priority (CNP) and should be progressed as quickly as possible.	
EN-5 Part 2: Assessment and Technology-Specific Information			
Factors influencing site selection and design	Draft EN-5 2.2.8 and 2.2.9	There will usually be ~~some~~ a degree of flexibility ~~around~~ in the location of the development's associated substations, and applicants ~~will give consideration to how they are placed~~ should consider carefully their placement in the local landscape, as well as their design ~~taking account of such things as,~~. In particular, the applicant should consider such characteristics as the local topography, ~~and~~ the ~~possibility of~~ possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10~~8~~ below and Section 5.10~~9~~ in EN-1.)	The siting of the AyM onshore substation has been a key consideration for the Applicant. As set out in the ES Volume 3, Chapter 2: Landscape and Visual Impact Assessment (REP8-087) and as discussed at Issue Specific Hearing 2 (ISH2), the local topography has influenced the proposed orientation of the substation and elements, such as the temporary construction compound, located as far as practicable from residential receptors whilst also using the available woodland screening. In addition, proposals are set out in the oLEMP (REP7-026) that will further screen the substation buildings. Section 1 of the AyM Onshore Project Description (APP-062) outlines that three zones (OnSS Access Zone; OnSS Cable Corridor Zone; OnSS Temporary Access Zone) have been used to create the design envelope for aspects of the OnSS. These zones have been assessed in the Environmental Statement and will be further refined during detailed design (post consent). The process of identifying the OnSS site has been presented in appropriate detail within the site selection and alternatives chapter of the ES, and associated annexes (APP-044 *et seq*.). An assessment of the potential landscape and visual impacts of the proposed substation (OnSS) is provided in the Landscape and Visual Impact Assessment (REP8-087). The proposed mitigation, which includes landscape screening and opportunities for landscape and ecological enhancement is presented in the oLEMP (REP7-026). Details of landscape screening for the OnSS is detailed in the oLEMP (REP7-026) and the draft Development Consent Order (REP8-118) contains R8 which secures landscaping at the OnSS. As such AyM can be

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
			considered to be in accordance with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Land Rights and Land Interests	Draft EN-5 2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance.[9] 9 - https://www.gov.uk/government/publications/planning-act-2008-procedures-for-the-compulsory-acquisition-ofland	The Applicant is seeking powers of compulsory acquisition in the AyM application and in accordance with this draft has only sought to acquire land needed for the substation and for landscape enhancement and biodiversity benefit in this location. The reasons and justification for seeking these powers are included in the Statement of Reasons (REP8-019). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
Special assessment principles for offshore-onshore transmission	Draft EN-5 2.12.1	The scale of offshore transmission infrastructure required to support the government's 50GW offshore wind development ambition has significant implications for the onshore network.	At present there is no viable offshore transmission network existing or planned for AyM to connect to. Coordination of the offshore transmission network with other offshore generation or transmission projects is therefore not possible for AyM at this time. AyM was not included as part of the Offshore Transmission Network Review (OTNR) early opportunities workstream and is progressing on the basis of the radial connection at Bodelwyddan agreed with National Grid. This position has not changed following the publication of the OTNR outcomes in July 2022. However, an interlink between AyM and GyM remains part of the application as it may offer increased network redundancy and system security. Further details of the Applicant's position with regards to the OTNR is set out in the Grid Connection and Cable Details Statement (APP-296). As such, the application is considered to accord with the provisions of the draft NPS insofar as the drafting remains as currently drafted.
	Draft EN-5 2.12.2	A substantial amount of new onshore network infrastructure, including network reinforcements, will be required to enable transmission of the domestic and international offshore power flows coming onshore or power being exported to neighbouring North Seas countries[23]. 23 - In this context 'North Seas' refers to the North Sea and seas around the UK and Ireland.	
	Draft EN-5 2.12.3	As identified in EN-1, (paragraphs 3.3.4 – 3.3.5), it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning of connections to reinforcements of the onshore transmission network than previously. This includes interconnectors, multi-purpose interconnectors (MPIs) and offshore 'bootstraps' reinforcing the onshore network. [24] 24 - In this context, offshore transmission means all cabling and associated infrastructure up to and including the (typically onshore) interface point with the main National Electricity Transmission System (NETS). This also includes offshore 'bootstraps' which are part of the NETS i.e. the onshore network though are routed offshore.	
	Draft EN-5 2.12.4	The above offshore-onshore transmission co-ordination work is undertaken through a process of ongoing reform as part of the OTNR[25]. 25 - Offshore Transmission Network Review (OTNR): https://www.gov.uk/government/groups/offshore-transmissionnetwork-review. As the OTNR is an ongoing process of reform, further planning policy guidance may be needed in due course to reflect the full outcomes of the OTNR.	
	Draft EN-5 2.12.5	In addition, a more co-ordinated approach to designing transmission offshore is expected to be adopted compared with the previous standard approach of radial routes to shore. This applies to	

SECTION/ TOPIC	PARAGRAPH REF	NPS REQUIREMENT	ACCORDANCE WITH THE NPS
		spatially close groups of offshore windfarms, interconnectors, multi-purpose interconnectors and bootstraps.	
	Draft EN-5 2.12.6	Co-ordinated transmission proposals are principally developed under OTNR workstreams with the lead party or parties for the initial co-ordination proposals varying according to the different temporal workstreams. [26] 26 The transition to more co-ordinated transmission is led by three temporal workstreams under the Offshore Transmission Network Review (OTNR). Co-ordinated transmission projects are being brought forward voluntarily by developers as Pathfinders as part of the 'Early Opportunities' workstream. For other less developed offshore wind projects, their connection to a transmission network has been determined through a new Holistic Network Design (HND) under the 'Pathway to 2030' workstream. The 'Enduring Regime' for offshore transmission considers the long-term. In addition, multi-purpose interconnector (MPI) proposals are part of the work of the OTNR across all timeframes.	

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