The Planning Inspectorate
Yr Arolygiaeth Gynllunio

BARN GWMPASU:

Prosiect Ynni Gwynt Alltraeth Arfaethedig Mona

Cyfeirnod yr Achos: EN010137

Mabwysiadwyd gan yr Arolygiaeth Gynllunio (ar ran yr Ysgrifennydd Gwladol) yn unol â Rheoliad 10 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017

15 Mehefin 2022

TABL CYNNWYS

ATODIAD 2: YMATEBWYR I'R YMGYNGHORIAD A CHOPÏAU O YMATEBION

1. CYFLWYNIAD

1.0.1 Ar 05 Mai 2022, derbyniodd yr Arolygiaeth Gynllunio (yr Arolygiaeth) gais am Farn Gwmpasu gan Mona Offshore Wind Limited (yr Ymgeisydd) o dan Reoliad 10 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017 (y Rheoliadau AEA) ar gyfer Prosiect Ynni Gwynt Alltraeth arfaethedig Mona (y Datblygiad Arfaethedig). Rhoddodd yr Ymgeisydd wybod i'r Ysgrifennydd Gwladol o dan Reoliad 8(1)(b) y rheoliadau hynny ei fod yn bwriadu darparu Datganiad Amgylcheddol mewn perthynas â'r Datblygiad Arfaethedig a, thrwy gyfrwng Rheoliad 6(2)(a), bod y Datblygiad Arfaethedig yn 'ddatblygiad AEA'.

1.0.2 Darparodd yr Ymgeisydd y wybodaeth angenrheidiol i lywio cais o dan Reoliad AEA 10(3) ar ffurf Adroddiad Cwmpasu, sydd ar gael yn:

http://infrastructure.planninginspectorate.gov.uk/document/EN010137-000011

1.0.3 Y ddogfen hon yw'r Farn Gwmpasu (y Farn) a fabwysiadwyd gan yr Arolygiaeth ar ran yr Ysgrifennydd Gwladol. Gwneir y Farn hon ar sail y wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu, gan adlewyrchu'r Datblygiad Arfaethedig fel y'i disgrifir ar hyn o bryd gan yr Ymgeisydd. Dylai'r Farn hon gael ei darllen ar y cyd ag Adroddiad Cwmpasu'r Ymgeisydd.

1.0.4 Mae'r Arolygiaeth wedi amlinellu yn yr adrannau canlynol o'r Farn hon lle y mae wedi cytuno / anghytuno i hepgor agweddau / materion penodol ar sail y wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu. Mae'r Arolygiaeth yn fodlon na ddylai derbyn y Farn Gwmpasu hon atal yr Ymgeisydd rhag cytuno wedi hynny â'r cyrff ymgynghori perthnasol i hepgor y cyfryw agweddau / materion o'r Datganiad Amgylcheddol, lle y darparwyd tystiolaeth ychwanegol i gyfiawnhau'r dull hwn. Fodd bynnag, er mwyn dangos bod yr agweddau / materion wedi derbyn sylw'n briodol, dylai'r Datganiad Amgylcheddol esbonio'r rhesymeg dros eu hepgor a chyfiawnhau'r dull a ddefnyddiwyd.

1.0.5 Cyn mabwysiadu'r Farn hon, ymgynghorodd yr Arolygiaeth â'r 'cyrff ymgynghori' a restrir yn Atodiad 1 yn unol â Rheoliad AEA 10(6). Rhoddir rhestr o'r cyrff ymgynghori a ymatebodd o fewn y raddfa amser statudol (ynghyd â chopïau o'u sylwadau) yn Atodiad 2. Mae'r sylwadau hyn wedi cael eu hystyried wrth baratoi'r Farn hon.

1.0.6 Mae'r Arolygiaeth wedi cyhoeddi cyfres o nodiadau cyngor ar y wefan Cynllunio Seilwaith Cenedlaethol, gan gynnwys Nodyn Cyngor 7: *Asesu Effeithiau Amgylcheddol: Gwybodaeth Amgylcheddol Ragarweiniol, Sgrinio a Chwmpasu* (AN7). Mae AN7 a'i atodiadau yn rhoi arweiniad ar brosesau AEA yn ystod y camau cyn-ymgeisio a chyngor i gynorthwyo ymgeiswyr i baratoi eu Datganiad Amgylcheddol.

1.0.7 Dylai ymgeiswyr roi sylw penodol i'r cyngor sefydlog yn AN7, ochr yn ochr â nodiadau cyngor eraill ar broses Deddf Cynllunio 2008, sydd ar gael yn:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 Ni ddylid ystyried bod y Farn hon yn awgrymu bod yr Arolygiaeth yn cytuno â'r wybodaeth neu'r sylwadau a roddwyd gan yr Ymgeisydd yn ei gais am farn gan yr Arolygiaeth. Yn arbennig, ni fydd sylwadau gan yr Arolygiaeth yn y Farn hon yn rhagfarnu unrhyw benderfyniadau diweddarach a wneir (e.e. pan gyflwynir y cais yn ffurfiol) y dylai unrhyw ddatblygiad a amlygwyd gan yr Ymgeisydd gael ei drin o reidrwydd fel rhan o Brosiect Seilwaith o Arwyddocâd Cenedlaethol (NSIP) neu Ddatblygiad Cysylltiedig neu ddatblygiad nad oes arno angen caniatâd datblygu.

2. SYLWADAU TROSFWAOL

2.1 Disgrifiad o'r Datblygiad Arfaethedig

(Adroddiad Cwmpasu Rhan 1 Adran 3)

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.1.1	Rhan 1, Adran 3.3	Dull Amlen Dylunio Prosiect (PDE).	Mae Rhan 1, paragraff 3.1.1.2 yn cyfeirio at 'Senarios achos gwaethaf realistig'. Nid yw'n glir sut mae'r rhain yn berthnasol i'r senario dylunio mwyaf yn Rhan 1 adran 3.3. Cyfeiriwyd at 'senario dylunio realistig' hefyd yn y bennod ar sŵn tanddwr (Rhan 2 paragraff 3.2.7.4 a Rhan 3, paragraff 3.2.7.4). Dylai'r Datganiad Amgylcheddol asesu'r achos gwaethaf a allai gael ei adeiladu yn unol â Datblygiad Awdurdodedig y Gorchymyn Caniatâd Datblygu (DCO) yr ymgeisir amdano; mae hyn yn cynnwys y canlynol (ond nid yw'n gyfyngedig iddynt): paramedrau sy'n ymwneud â nifer y tyrbinau, uchder tyrbinau, mathau o sylfeini, gosod deunyddiau i atal erydu, amddiffyn ceblau a gosodiad strwythurau alltraeth.
2.1.2	Rhan 1, paragraff 3.4.3.6	Safle gwaredu drilio.	Dylai'r Datganiad Amgylcheddol amlygu'r safle tebygol i waredu deunyddiau sy'n deillio o ddrilio a chynnwys asesiad o effeithiau'r gweithgareddau hyn.
2.1.3	Rhan 1, Adran 3.4.4	Paratoi gwely'r môr.	Dylai'r Datganiad Amgylcheddol roi rhagor o fanylion am y gweithgareddau arfaethedig sy'n ofynnol i baratoi gwely'r môr ac amlygu'r ôl troed gwaethaf a fyddai'n codi o ran aflonyddu ar wely'r môr. Pe byddai paratoi gwely'r môr yn cynnwys carthu, dylai'r Datganiad Amgylcheddol nodi symiau'r deunyddiau wedi'u carthu a'r lleoliad tebygol ar gyfer eu gwaredu. Dylid asesu unrhyw effeithiau arwyddocaol tebygol yn sgil carthu.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Mae'r Arolygiaeth yn deall nad yw nifer, math a maint dyfeisiau ordnans heb ffrwydro (UXO) yn hysbys ar hyn o bryd ac y bydd arolwg UXO penodol yn cael ei gynnal cyn gwaith adeiladu. Felly, dylai'r Datganiad Amgylcheddol esbonio'r tybiaethau gwybodus a ddefnyddiwyd i sefydlu'r amlen ddylunio fwyaf.
2.1.4	Rhan 1, Tablau 3.3 i 3.7 ac Adran 3.4.5	Gosod deunyddiau i atal erydu.	Mae'r Adroddiad Cwmpasu wedi manylu ar uchafswm olion traed gwely'r môr ar gyfer gwahanol fathau o sylfeini heb osod deunyddiau i atal erydu. Mae paragraff 3.4.5.3 yn datgan y bydd faint o ddeunyddiau a ddarperir i atal erydu yn amrywio ar gyfer gwahanol fathau o sylfeini. Dylai'r Datganiad Amgylcheddol gadarnhau faint o ddeunyddiau sy'n ofynnol i atal erydu ar gyfer pob math o sylfeini sy'n cael eu hystyried, beth fyddai uchafswm olion traed gwely'r môr a'r graddfeydd amser ar gyfer gosod.
2.1.5	Rhan 1, Adran 3.4.7	Amddiffyn y cebl.	Mae Rhan 2, Adran 5.1.6 a Rhan 3, Adran 5.1.6 yn datgan y bydd dyfnder targed o 1m ar gyfer amddiffyn y cebl. Dylai'r Datganiad Amgylcheddol esbonio pam efallai na fydd modd cyflawni dyfnderoedd claddu ar gyfer hyd y cebl. Dylai fanylu ar uchafswm cyfaint y deunyddiau sy'n ofynnol ar gyfer amddiffyn y cebl ac esbonio sut y meintiolwyd hyn.
2.1.6	Rhan 1, paragraffau 3.5.2.4 a 3.5.3.4	Gosod y cebl.	Gan fod yr elfennau glanio ac ar y tir yn destun ardaloedd chwilio o hyd, nid yw'n glir eto p'un a fyddai angen unrhyw groesfannau dros dro neu barhaol ar draws cyrsiau dŵr, prif ffyrdd a / neu reilffyrdd. Dylai'r Datganiad Amgylcheddol amlygu lleoliad a math pob croesfan o'r fath. Pan ddibynnir ar ddefnyddio dull penodol i liniaru effeithiau arwyddocaol, dylai'r Ymgeisydd sicrhau bod ymrwymiadau o'r fath wedi'u diffinio a'u sicrhau yn briodol.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.1.7	Rhan 1, Adran 3.5.4	Is-orsaf ar y tir.	Mae'r Adroddiad Cwmpasu yn datgan bod dau opsiwn ar gyfer is-orsaf wedi'u cynnwys yn yr amlen ddylunio: Switshis wedi'u Hinswleiddio ag Aer (AIS) lle mae'r offer yn cael ei gadw mewn iard agored, a Switshis wedi'u Hinswleiddio â Nwy (GIS) lle mae'r offer yn cael ei gadw mewn un adeilad neu nifer o adeiladau. Mae'n bosibl cael cyfuniad o'r ddau hefyd. Nid yw'n glir p'un a fydd yr opsiynau hyn yn aros yn y cais DCO. Mae Rhan 1, Tabl 3.13 yn amlinellu'r amlen ddylunio ar gyfer yr is-orsaf ar y tir. Mae'n nodi hyd at bedwar adeilad ac yn darparu dimensiynau 'prif adeilad'. Nid oes dimensiynau wedi'u darparu ar gyfer yr adeiladau eraill. Dylai'r Datganiad Amgylcheddol nodi'n glir y paramedrau achos gwaethaf ar gyfer asesu, yn enwedig o ran effeithiau ar y dirwedd ac effeithiau gweledol.
2.1.8	Rhan 1, paragraffau 3.6.1 a 3.7.1.3	Lleoliad porthladd adeiladu a chanolfan gweithrediadau a chynnal a chadw.	Dylai'r Ymgeisydd wneud ymdrech i nodi lleoliad y porthladd a'r ganolfan gweithrediadau a chynnal a chadw, lle y bo'n bosibl, ac asesu unrhyw effeithiau arwyddocaol tebygol sy'n gysylltiedig. Os nad yw'r lleoliadau wedi cael eu cadarnhau, dylai'r Datganiad Amgylcheddol wneud ymdrech i asesu'r effeithiau arwyddocaol tebygol sy'n gysylltiedig â thybiaethau perthnasol a senario achos gwaethaf.
2.1.9	Rhan 3, paragraff 8.1.6.1	Goleuadau alltraeth.	Mae'r Adroddiad Cwmpasu yn nodi sawl gwaith y byddai angen i'r elfennau alltraeth gael eu goleuo at ddibenion mordwyo. Dylai'r Datganiad Amgylcheddol fanylu ar unrhyw ofynion goleuo dros dro neu barhaol a sicrhau bod unrhyw effeithiau arwyddocaol tebygol o ganlyniad i'w presenoldeb yn cael eu hasesu yn y Datganiad

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Amgylcheddol; gan roi ystyriaeth benodol i dderbynyddion ecolegol, tirwedd a gweledol a mordwyol.
2.1.10	dd/b	Disgrifiad o'r prosiect.	Nid yw'r Adroddiad Cwmpasu yn disgrifio unrhyw offer ychwanegol sy'n aml yn gysylltiedig â ffermydd gwynt alltraeth, fel mastiau meteorolegol a bwiau. Dylai'r Ymgeisydd sicrhau bod y disgrifiad o'r prosiect yn y Datganiad Amgylcheddol a'r asesiad yn cynnwys pob elfen o'r prosiect.
2.1.11	Rhan 1, Adran 3.7	Gweithredu a chynnal a chadw.	Dylai'r Datganiad Amgylcheddol roi disgrifiad llawn o natur a chwmpas gweithgareddau gweithredu a chynnal a chadw, gan gynnwys mathau o weithgareddau, amlder, a sut y bydd gwaith yn cael ei gynnal ar gyfer elfennau alltraeth ac ar y tir. Dylai hyn hefyd ystyried y posibilrwydd o weithgareddau sy'n gorgyffwrdd â'r rhai hynny sy'n ofynnol ar gyfer gweithrediad parhaus ffermydd gwynt sydd eisoes yn bodoli yn yr ardal ac adeiladu rhai arfaethedig.
2.1.12	Rhan 3, Tabl 6.8 a Rhan 4, Atodiad B, paragraff 2.1.2.3	Pentyrru.	Mae pentyrru deunydd a gloddiwyd wedi'i nodi yn y bennod ar hydroleg a pherygl llifogydd a sgrinio'r Gyfarwyddeb Fframwaith Dŵr, ond nid oes sôn am bentyrru yn y Disgrifiad o'r Prosiect na'r adrannau ar ddaeareg, hydroddaeareg a chyflwr y tir. Dylai'r Datganiad Amgylcheddol gadarnhau symiau'r deunyddiau sydd i'w pentyrru a bod yn gyson yn y ffordd y mae'n adrodd.
2.1.13	dd/b	Cyflogaeth.	Dylai'r Datganiad Amgylcheddol fanylu ar nifer y swyddi amser llawn a rhan-amser y disgwylir iddynt gael eu creu gan bob cam o'r Datblygiad Arfaethedig.
2.1.14	dd/b	Symudiadau llongau.	Yn ogystal â manylion am symudiadau cerbydau y mae'r Adroddiad Cwmpasu wedi cynnig eu cynnwys yn y Datganiad Amgylcheddol (Rhan 3, Tabl 8.9), dylai'r Datganiad Amgylcheddol fanylu ar fath, nifer ac

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			amlder symudiadau llongau sy'n ofynnol i adeiladu a gweithredu'r Datblygiad Arfaethedig.
2.1.15	dd/b	Y berthynas â ffermydd gwynt alltraeth eraill.	Mae'r Datblygiad Arfaethedig wedi'i leoli ym Môr Iwerddon ac mae ffermydd gwynt alltraeth a adeiladwyd ac arfaethedig gerllaw. Mae'r Arolygiaeth o'r farn y byddai'n ddefnyddiol cynnwys ffigur yn yr adran gyflwyniadol o'r Datganiad Amgylcheddol sy'n rhoi'r Datblygiad Arfaethedig yng nghyd-destun y ffermydd gwynt alltraeth amgylchynol.

2.2 Methodoleg AEA a Chwmpas yr Asesiad

(Adroddiad Cwmpasu Rhan 1 Adran 4)

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.2.1	Rhan 1, Adran 1.4.1	Diben y Datganiad Amgylcheddol.	Mae'r Adroddiad Cwmpasu yn datgan, yn ogystal â bod yn barod i gefnogi cais am Farn Gwmpasu gan yr Ysgrifennydd Gwladol, y bydd hefyd yn cefnogi cwmpasu gyda Cyfoeth Naturiol Cymru (CNC) o ran cais am Drwydded Forol. Atgoffir yr Ymgeisydd bod archwiliad DCO yn gallu archwilio materion sy'n ymwneud â'r cais DCO yn unig. Felly, dylai sicrhau bod y Datganiad Amgylcheddol yn nodi'n glir faterion sy'n berthnasol i bob cais ar wahân a bod y dulliau o sicrhau mesurau lliniaru trwy naill ai Ofynion yn y DCO neu Amodau yn y Drwydded Forol yn cael eu hamlygu'n glir.
2.2.2	Rhan 1, Adran 4.4.1	Ardaloedd astudio.	Dylai'r Ymgeisydd geisio cytuno ar ardaloedd astudio a derbynyddion gyda'r cyrff ymgynghori perthnasol. Dylai'r Datganiad Amgylcheddol gadarnhau p'un a yw'r ardal astudio a gynigiwyd yn cyd-fynd â pholisi ac arweiniad perthnasol a darparu cyfiawnhad ar gyfer unrhyw wyriadau. Dylai'r Datganiad Amgylcheddol gynnwys ffigurau i amlygu'r ardal astudio derfynol ar gyfer pob agwedd a lleoliad unrhyw dderbynyddion sefydlog a ystyrir yn yr asesiad. Mae'r ardaloedd astudio asedau cynhyrchu ar gyfer ecoleg fenthig, islanw a rhynglanw ac ecoleg pysgod a physgod cregyn yn cynnwys ffin llinell syth ar yr ymyl gorllewinol sy'n ymddangos yn fympwyol o safbwynt effeithiau. Dylai'r ardaloedd astudio gwmpasu'n ddigonol maint llawn unrhyw dderbynyddion y mae'n debygol y bydd effaith arwyddocaol arnynt.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.2.3	Rhan 1, paragraff 4.4.3	Dull wedi'i seilio ar dystiolaeth.	Mae'r Arolygiaeth yn cydnabod bod data a gwybodaeth ynglŷn â'r amgylchedd sylfaenol yn bodoli o arolygon, asesiadau a gwaith monitro ôl-adeiladu ar gyfer prosiectau ynni gwynt alltraeth arfaethedig a phresennol eraill. Mae'r Arolygiaeth yn deall buddion defnyddio'r wybodaeth hon i ategu data arolwg sy'n benodol i safle, ond mae'n cynghori y dylid cymryd gofal priodol i sicrhau bod y wybodaeth yn y Datganiad Amgylcheddol yn parhau i fod yn gynrychioliadol ac yn addas i'r diben. Dylai hyn gynnwys ystyried effaith datblygiadau mwy diweddar sydd wedi digwydd ar ôl i'r data gael ei gasglu. Yn yr un modd, pan ddefnyddir data o ffermydd gwynt eraill i ategu'r asesiad, dylai'r Datganiad Amgylcheddol gadarnhau bod y rhain yn wirioneddol gymaradwy, er enghraifft o ran maint sylfeini/tyrbinau. Dylai'r Ymgeisydd wneud ymdrech i gytuno ar addasrwydd y wybodaeth a ddefnyddir ar gyfer asesiadau yn y Datganiad Amgylcheddol gyda chyrff ymgynghori perthnasol (e.e. CNC).
2.2.4	Rhan 1, Adran 4.5	Maint yr effaith a sensitifrwydd derbynyddion.	Lle y bo'n bosibl, dylai'r Ymgeisydd geisio cytuno ar faint yr effaith neu sensitifrwydd derbynyddion gydag ymgyngoreion perthnasol trwy'r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a'r broses cyn-ymgeisio. Pan fydd gwahaniaeth barn yn parhau, dylai hyn gael ei amlygu yn y Datganiad Amgylcheddol gyda chyfiawnhad ar gyfer dewis yr Ymgeisydd.
2.2.5	Part 1, paragraph 4.5.1.1	Gwrthdroadwyedd effeithiau.	Dylai'r Datganiad Amgylcheddol ddiffinio beth fyddai 'graddfa amser resymol' neu 'gyfnod byr' pryd y gallai adferiad ddigwydd fel y byddai effaith yn wrthdroadwy/heb fod yn barhaol.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.2.6	Rhan 1, Adran 4.8	Effeithiau cronnol.	Dylai'r Ymgeisydd nodi bod y mathau o ddatblygiadau mawr a restrir yn Nodyn Cyngor Dau ar Bymtheg yr Arolygiaeth Gynllunio: Asesu Effeithiau Cronnol mewn perthynas â Phrosiectau Seilwaith o Arwyddocâd Cenedlaethol yn berthnasol i'r amgylchedd ar y tir yn ogystal â'r amgylchedd alltraeth. Gan fod nifer o ddatblygiadau parhaus yng nghyffiniau safle cais y Datblygiad Arfaethedig, dylai'r Datganiad Amgylcheddol ddatgan yn glir pa ddatblygiadau y tybir eu bod yn rhan o'r asesiad sylfaenol a pha rai sydd i'w hystyried yn yr asesiad effeithiau cronnol. Mae nifer o ymatebwyr i'r Adroddiad Cwmpasu (gan gynnwys Natural England, Cyngor Sir Ddinbych a Llywodraeth Ynys Manaw) wedi amlygu datblygiadau arfaethedig yng nghyffiniau'r Datblygiad Arfaethedig, neu wedi rhoi cyngor ar y mathau o brosiectau, cynlluniau neu weithgareddau y dylid eu cynnwys (gweler Atodiad 2 y Farn hon); dylai'r rhain gael eu hystyried yn yr asesiad effeithiau cronnol. Dylai'r Ymgeisydd geisio cytuno ar gwmpas y prosiectau a asesir gyda'r cyrff ymgynghori hyn.
2.2.7	dd/b	Mesurau lliniaru.	Cyfeiriwyd at nifer o gynlluniau lliniaru mewn penodau ar agweddau. Pan ddibynnir ar gynlluniau i osgoi effeithiau amgylcheddol arwyddocaol, dylai cynlluniau amlinellol neu mewn egwyddor gael eu cyflwyno yn rhan o'r cais DCO.
2.2.8	dd/b	Cynlluniau rheoli.	Mae'r Adroddiad Cwmpasu yn cyfeirio at Gynllun Rheoli Amgylcheddol a Chynllun Rheoli Ecolegol ac yn defnyddio'r talfyriad Saesneg EMP ar gyfer y ddau. I osgoi dryswch, dylai'r Ymgeisydd ddarparu enwau a thalfyriadau gwahanol ar gyfer ei gynlluniau rheoli arfaethedig.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
2.2.9	dd/b	Ansawdd dŵr morol.	Dylai'r Datganiad Amgylcheddol amlygu unrhyw effeithiau arwyddocaol tebygol ar ansawdd dŵr morol yn sgil rhyddhau mwd drilio a ddefnyddir wrth y lanfa ac yn sgil rhyddhau bacteria ac amodau gwell iddynt oroesi o ganlyniad i grynodiadau uwch o waddodion crog (SSC). Dylid asesu effeithiau dilynol ar Ddyfroedd Ymdrochi ac ecoleg fenthig a rhynglanw, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

3. SYLWADAU AR YR AGWEDD AMGYLCHEDDOL

3.1 Prosesau Ffisegol

Adroddiad Cwmpasu Rhan 2, Adran 3.1 (Asedau Cynhyrchu) a Rhan 3, Adran 3.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.1.1	Rhan 2, Tabl 3.3 a Rhan 3, Tabl 3.4	Newidiadau i fathymetreg o ganlyniad i bantiau a adawyd gan longau jacio. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan bod gwaith monitro yn fferm wynt alltraeth Barrow wedi dangos bod pantiau wedi'u mewnlenwi 12 mis ar ôl adeiladu. Mae'r Arolygiaeth yn cytuno y byddai unrhyw newidiadau i fathymetreg o ganlyniad i bantiau a adawyd gan longau jacio yn debygol o fod dros dro ac yn annhebygol o arwain at effeithiau arwyddocaol. Felly, gellir hepgor y mater hwn o'r Datganiad Amgylcheddol. Mae'r Adroddiad Cwmpasu hefyd yn cynnig hepgor effeithiau o draed (spud-cans) llongau jacio ac olion traed llongau jacio ar y patrymedd gwaddodol. Ni roddwyd unrhyw gyfiawnhad penodol dros y casgliad hwn yn yr Adroddiad Cwmpasu ac nid oes tystiolaeth na fyddai erydu ychwanegol o'r pantiau yn arwain at effeithiau arwyddocaol. Felly, nid yw'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn. Gweler Rhif Adnabod 3.1.2 isod ynglŷn ag erydu eilaidd.
3.1.2	Rhan 2, Tabl 3.3 a Rhan 3, Tabl 3.4	Erydu gwaddodion gwely'r môr yn ystod y cam gweithredu a chynnal a chadw. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Arolygiaeth yn nodi y byddai deunyddiau i atal erydu yn cael eu gosod, ond mae wedi ystyried yr ymatebion gan CNC a Natural England (gweler Atodiad 2 y Farn hon) ynglŷn â'r mater hwn ac yn dod i'r casgliad y dylai effeithiau erydu eilaidd gael eu cynnwys yn yr asesiad. Nid oes unrhyw wybodaeth wedi'i darparu ynglŷn â'r graddfeydd amser ar gyfer gosod deunyddiau i atal erydu. Dylai'r Datganiad Amgylcheddol hefyd roi manylion ynglŷn â graddfeydd amser ar gyfer

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			gosod deunyddiau i atal erydu a naill ai rhoi sicrwydd y byddai'r graddfeydd amser ar gyfer gosod deunyddiau i atal erydu yn ddigonol i sicrhau na fyddai effeithiau arwyddocaol tebygol, neu ddarparu asesiad o effeithiau cyn gosod deunyddiau i atal erydu, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.1.3	Rhan 2, Adran 3.1.2	Ardal astudio. (Asedau cynhyrchu)	Mae Rhan 2, Tabl 3.2 yn datgan y gallai sylfeini a deunyddiau cysylltiedig i atal erydu o fewn ardal yr aráe amharu ar dymheredd a haeniad halwynedd a'u hamrywiad tymhorol yn Aber Dyfrdwy a bod yr effaith hon wedi'i hamlygu'n benodol ym mhroses y Cynllun Tystiolaeth. Mae'r Arolygiaeth yn nodi bod Aber Dyfrdwy y tu allan i'r ardal astudio arfaethedig a ddangosir yn Rhan 2 Ffigur 3.2. Felly, dylai'r Ymgeisydd roi cyfiawnhad ychwanegol dros yr ardal astudio arfaethedig a sicrhau bod yr holl dderbynyddion y mae'n debygol y bydd effaith arnynt yn cael eu hamlygu.
3.1.4	Rhan 2, Tabl 3.2 a Rhan 3, Tabl 3.3	Effeithiau o lefelu gwely'r môr. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Rhan 1, paragraff 3.4.4.1 yn datgan efallai y bydd angen lefelu gwely'r môr. Dylai'r Datganiad Amgylcheddol asesu unrhyw effeithiau eilaidd arwyddocaol tebygol y gallai hyn eu cael ar newidiadau i'r patrymedd cerrynt/llif, y patrymedd tonnau a'r patrymedd cludo gwaddodion ac unrhyw newidiadau morffolegol. Dylai effeithiau o garthu a gwaredu deunyddiau gael eu hasesu hefyd, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

3.2 Sŵn tanddwr

Adroddiad Cwmpasu Rhan 2 Adran 3.2 (Asedau Cynhyrchu) a Rhan 3 Adran 3.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.2.1	Rhan 2, Tabl 3.6 a Rhan 3, Tabl 3.7	Effeithiau elfennau symud gronynnau yn sgil sŵn tanddwr ar famaliaid môr yn ystod pob cam. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan nad oes digon o dystiolaeth fod symudiad gronynnau yn cael unrhyw effaith ar famaliaid môr. Heb wybodaeth fel tystiolaeth sy'n dangos cytundeb clir â chyrff statudol perthnasol, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y materion hyn o'r asesiad. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn, neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb effaith arwyddocaol debygol.

Rhif adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.2.2	Rhan 2, Adran 3.2.1 a Rhan 3, Adran 3.2.1	Cydberthnasoedd â Physgodfeydd Masnachol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan y byddai'r astudiaeth sŵn tanddwr yn cefnogi'r bennod ar Bysgodfeydd Masnachol yn y Datganiad Amgylcheddol. Nid yw'r penodau perthnasol yn yr Adroddiad Cwmpasu (Rhan 2, Adran 5.1 a Rhan 3, Adran 5.1) yn amlygu sŵn fel effaith bosibl. Dylai dylanwad effeithiau sŵn ar bysgodfeydd masnachol (h.y. o ganlyniad i effeithiau ar rywogaethau a dargedir) gael ei esbonio'n glir a'i asesu yn y Datganiad Amgylcheddol.
3.2.3	Rhan 2, Tabl 3.5 a	Effeithiau sŵn tanddwr ar fywyd môr o ganlyniad i dorri a thynnu	Mae Rhan 2, Tabl 3.5 a Rhan 3, Tabl 3.6 yn cynnig asesu effeithiau sŵn tanddwr ar fywyd môr o ganlyniad i dorri a thynnu ymaith sylfeini gorchuddiol neu seilbyst yn ystod datgomisiynu. Nid yw'r

Rhif adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	Rhan 3, Tabl 3.6	ymaith sylfeini gorchuddiol neu seilbyst. (Asedau cynhyrchu ac asedau trosglwyddo)	Adroddiad Cwmpasu yn cynnig asesu'r effaith bosibl hon ym mhenodau'r Datganiad Amgylcheddol ar Ecoleg Pysgod a Physgod Cregyn, Mamaliaid Môr nac Adareg Alltraeth. Dylai canlyniadau'r asesiad hwn gael eu cyflwyno yn y penodau perthnasol.
3.2.4	Rhan 2, Adran 3.2.7 a Rhan 3, Adran 3.2.7	Posibilrwydd o anaf a tharfu ar ymddygiad. (Asedau cynhyrchu ac asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol ddisgrifio'r Newid Trothwy Parhaol (PTS), y Newid Trothwy Dros Dro (TTS) a'r amrediadau aflonyddu a ddefnyddiwyd ar gyfer yr holl rywogaethau a aseswyd, yn ogystal â'r posibilrwydd y gallai'r olion traed effaith aflonyddu orgyffwrdd â ffin safleoedd alltraeth dynodedig.
3.2.5	Rhan 2, Adran 3.2.7 a Rhan 3, Adran 3.2.7	Modelu ar gyfer gweithgareddau nad ydynt yn ymwneud â gosod seilbyst. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae paragraff 3.2.7.4 yn awgrymu y bydd gwaith modelu lledaeniad sŵn yn cael ei wneud ar gyfer gweithrediadau gosod seilbyst yn unig. Fodd bynnag, mae paragraff 3.2.1.2 a Thabl 3.5 yn amlygu'r posibilrwydd y gallai gweithgareddau eraill gynhyrchu sŵn a dirgryniad tanddwr. Mae'r bennod ar yr agwedd Mamaliaid Môr hefyd yn nodi y bydd gwaith modelu'n cael ei wneud ar gyfer gweithgareddau 'swnllyd' nad ydynt yn ymwneud â gosod seilbyst, e.e. lleoli creigiau, symudiadau llongau. Nid yw'r Adroddiad Cwmpasu yn datgan p'un a fyddai gweithgareddau gosod ceblau (h.y. torri ffosydd, aredig, chwistrellu) yn cynhyrchu sŵn a dirgryniad tanddwr. Dylai'r Datganiad Amgylcheddol nodi pob ffynhonnell sŵn a dirgryniad tanddwr yn glir ac asesu effeithiau'r gweithgareddau hyn pan fydd effeithiau arwyddocaol yn debygol o ddigwydd. Dylai'r Datganiad Amgylcheddol nodi'r fethodoleg a'r tybiaethau ar gyfer yr holl waith modelu a wnaed.

Rhif adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.2.6	Rhan 2, paragraff 3.2.7.4 a Rhan 3, paragraff 3.2.7.7	Gosod seilbyst yn gyfamserol. (Asedau cynhyrchu ac asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol ddangos bod y senario achos gwaethaf yn cyfrif am weithgareddau gosod seilbyst cyfamserol sydd wedi'u lleoli cyn belled i ffwrdd o'i gilydd ag y byddai'n bosibl yn yr amlen ddylunio, gan felly arwain at yr effeithiau sŵn ehangaf posibl.

3.3 Ecoleg fenthig islanw a rhynglanw

Adroddiad Cwmpasu Rhan 2, Adran 4.1 (Asedau Cynhyrchu) a Rhan 3, Adran 4.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.3.1	Rhan 2, Tabl 4.5 a Rhan 3, Tabl 4.6	Effeithiau ar infertebratau benthig o ganlyniad i feysydd electromagnetig (EMF) (Asedau cynhyrchu ac asedau trosglwyddo)	Nid yw'r Arolygiaeth yn cytuno y gellir hepgor effeithiau meysydd electromagnetig (EMF) ar rywogaethau benthig, gan nad oes digon o dystiolaeth wedi'i darparu ar yr adeg hon i gefnogi'r dull hwn. Mae'r Adroddiad Cwmpasu yn amlygu dyfnder claddu targed o 1m (05m o leiaf), ond mae hefyd yn cyfeirio at hyblygrwydd / ansicrwydd sy'n gysylltiedig â'r dyfnder claddu tebygol ac yn cynnwys amddiffyn cebl, os na fydd modd claddu'r cebl alltraeth. Dylai'r Datganiad Amgylcheddol asesu'r effeithiau ar dderbynyddion ecoleg fenthig sensitif o ganlyniad i EMF, lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai'r Ymgeisydd wneud ymdrech i gytuno ar y dull asesu gyda chyrff ymgynghori perthnasol, gan gynnwys CNC.
3.3.2	Rhan 2, Tabl 4.5 a Rhan 3, Tabl 4.6	Llygredd damweiniol yn ystod adeiladu, gweithredu a chynnal a chadw, a datgomisiynu (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn cynnig hepgor llygredd damweiniol sy'n deillio o adeiladu, gweithredu a datgomisiynu'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol a'r Cynllun Wrth Gefn Llygredd Morol (MPCP) sy'n rhan ohono. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.
3.3.3	Rhan 2, Tabl 4.5	Effeithiau o ryddhau halogyddion sydd ynghlwm wrth waddodion (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan bod samplu hanesyddol yng nghyffiniau Ardal Aráe Bosibl Mona wedi dangos bod lefelau halogyddion gwaddodion yn isel, ac y bydd gwaith samplu cemeg

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			waddodion penodol i safle yn cael ei wneud yn ystod samplu rhynglanw. Ar yr adeg hon, a heb ganlyniadau gwaith samplu pellach, nid yw'r Arolygiaeth yn cytuno hepgor y mater hwn. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r effeithiau ar ecoleg fenthig o ganlyniad i ryddhau halogyddion sydd ynghlwm wrth waddodion, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.3.4	Rhan 2, Tabl 4.4 a Rhan 3, Tabl 4.5	Perygl uwch o gyflwyno a lledaenu rhywogaethau estron goresgynnol yn ystod gweithredu (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Arolygiaeth o'r farn bod perygl posibl o gyflwyno a lledaenu rhywogaethau estron goresgynnol yn ystod y cam gweithredol o ganlyniad i longau a ddefnyddir ar gyfer gweithgareddau cynnal a chadw. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o berygl uwch cyflwyno a lledaenu rhywogaethau estron goresgynnol yn ystod gweithredu ar dderbynyddion ecoleg fenthig, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.3.5	Rhan 2, Paragraff 4.1.4.26	Amodau sylfaenol a ffynonellau data (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan, o ddadansoddiad cychwynnol o ddata, bod Ardal Aráe Bosibl Mona yn annhebygol o fod â thebygrwydd mwy nag isel i'r cynefin 'cymunedau cwiliau môr a megaffawna tyrchol'. Mae'n bosibl bod dwy ardal sy'n dangos tebygrwydd isel i gynefin 'riff creigiog' yn bresennol. Cyfeirir sylw'r Ymgeisydd at Adroddiad Rhif 656 y Cyd-bwyllgor Cadwraeth Natur: Mireinio'r meini prawf ar gyfer diffinio ardaloedd â 'thebygrwydd isel' i riff creigiog Atodiad I', a allai fod yn ddefnyddiol i bennu cynefin o'r fath.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Anogir yr Ymgeisydd hefyd i drafod canfyddiadau canlyniadau arolwg rhagarweiniol 2021, yn enwedig o ran y mathau hyn o gynefinoedd/cymunedau, gyda CNC.
3.3.6	Rhan 3, Tabl 4.3	Safleoedd dynodedig (Asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol hefyd ystyried effeithiau posibl ar nodweddion benthig Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) Creigiau Rhiwledyn, sydd o fewn yr ardal astudio asedau trosglwyddo, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.3.7	Rhan 2, Paragraffau 4.1.4.28 a 4.1.4.30, Tabl 4.2 a Thabl 4.3	Rhywogaethau a chynefinoedd benthig perthnasol a warchodir a allai ddigwydd o fewn ardal astudio ecoleg fenthig islanw a rhynglanw Mona (Asedau cynhyrchu)	Cyfeirir sylw'r Ymgeisydd at y sylwadau a'r ffynonellau data a ddarparwyd gan Lywodraeth Ynys Manaw (gweler Atodiad 2 y Farn hon) yn ymwneud â safleoedd, cynefinoedd a rhywogaethau a warchodir yn nyfroedd Manaw sydd wedi'u lleoli o fewn ardal astudio ecoleg fenthig islaw a rhynglanw Mona ar gyfer asedau cynhyrchu. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r effeithiau ar safleoedd, cynefinoedd a rhywogaethau a warchodir yn nyfroedd Manaw, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.3.8	Rhan 3, Tabl 4.4	Rhywogaethau a chynefinoedd benthig perthnasol a warchodir a allai ddigwydd o fewn ardal astudio ecoleg fenthig islanw a rhynglanw Mona (Asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol ystyried, cyn belled ag y bo'n rhesymol bosibl, nodweddion Atodiad I y tu allan i Ardaloedd Cadwraeth Arbennig (ACAau) a allai ddigwydd o fewn ardal astudio benthig islanw a rhynglanw Mona e.e. Banc Constable (Banc Tywod Atodiad I y tu allan i'r ACA), lle y gallai effeithiau arwyddocaol ddigwydd.
3.3.9	Rhan 3, Tabl 4.5	Effeithiau posibl – colli/aflonyddu ar gynefinoedd dros dro a cholli cynefinoedd yn y tymor hir. (Asedau trosglwyddo)	Nid yw'n glir o'r Adroddiad Cwmpasu p'un a yw effeithiau posibl ar ecoleg fenthig o ganlyniad i weithgareddau glanio'r cebl (e.e. dulliau di-ffos) wedi'u cynnwys yn yr asesiad o golli/aflonyddu ar gynefinoedd dros dro a cholli cynefinoedd yn y tymor hir ar gyfer asedau trosglwyddo. Dylai'r Datganiad Amgylcheddol gynnwys

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			asesiad o weithgareddau glanio'r cebl ar ecoleg fenthig, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.3.10	Rhan 2, Tabl 4.4 a Rhan 3, Tabl 4.5	Effeithiau posibl – perygl uwch o gyflwyno a lledaenu rhywogaethau estron goresgynnol o ganlyniad i symudiadau llongau – dull asesu arfaethedig. (Asedau cynhyrchu a throsglwyddo)	Cynigir i'r asesiad o rywogaethau estron goresgynnol ar gyfer yr asedau trosglwyddo fod yn feintiol ei natur; fodd bynnag, cynigir iddo fod yn asesiad ansoddol ar gyfer yr asedau cynhyrchu. Cynigir hefyd i'r asesiad arfaethedig o 'gytrefu strwythurau caled' gan rywogaethau estron goresgynnol fod yn asesiad ansoddol. Nid yw'n glir a yw'r dull gwahanol yn fwriadol. Dylai'r Datganiad Amgylcheddol ddisgrifio'n glir y fethodoleg a ddefnyddiwyd i asesu rhywogaethau estron goresgynnol ar gyfer y Datblygiad Arfaethedig ac egluro lle y bwriedir defnyddio dulliau gwahanol o fewn agweddau ac ardaloedd astudio.
3.3.11	Rhan 2, Tabl 4.4 a Rhan 3, Tabl 4.5	Effeithiau posibl – newid cynefin. (Asedau cynhyrchu ac asedau trosglwyddo)	Nid yw Rhan 2, Tabl 4.4 yn nodi 'newid cynefin' fel un o effeithiau posibl y Datblygiad Arfaethedig. Gallai cyflwyno is-haenau caled arwain at gymunedau biolegol newydd a gwahanol mewn amgylchedd gwaddodion meddal yn bennaf. Dylai'r Datganiad Amgylcheddol ystyried effaith bosibl newid cynefin, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.3.12	Rhan 2, Tabl 4.4	Effeithiau posibl – gwres. (Asedau trosglwyddo)	Nid yw'r Adroddiad Cwmpasu wedi mynd i'r afael ag effeithiau posibl gwres a gynhyrchir o'r asedau trosglwyddo ar ecoleg fenthig islanw a rhynglanw. Mae'r Arolygiaeth o'r farn y dylai unrhyw effeithiau arwyddocaol tebygol o ganlyniad i effeithiau tymheredd o geblau gael eu cynnwys yn yr asesiad, gan ystyried effeithiau posibl ar ecoleg fenthig a thwf bacteriol.

3.4 Ecoleg pysgod a physgod cregyn

Adroddiad Cwmpasu Rhan 2, Adran 4.2 (Asedau Cynhyrchu) a Rhan 3, Adran 4.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.4.1	Rhan 2, Tabl 4.11 a Rhan 3, Tabl 4.12	Llygredd damweiniol yn ystod pob cam. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn cynnig hepgor llygredd damweiniol sy'n deillio o bob cam o'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol a'r Cynllun Wrth Gefn Llygredd Morol (MPCP) sy'n rhan ohono. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.
3.4.2	Rhan 2, Tabl 4.11	Sŵn tanddwr o weithredu tyrbinau gwynt yn ystod y cam gweithredu a chynnal a chadw. (Asedau cynhyrchu)	Mae'r Arolygiaeth yn nodi'r cyfeiriadau at lenyddiaeth ac adroddiadau monitro o ffermydd gwynt eraill sy'n dod i'r casgliad y byddai unrhyw effaith bosibl o dyrbinau gwynt gweithredol yn ddibwys. Fodd bynnag, dyddiad y rhain yw 2011 a 2014, ac mae allbwn a maint tyrbinau wedi cynyddu'n fawr ers hynny. Heb dystiolaeth y byddai gan y tyrbinau gwynt allbynnau sŵn cymaradwy, nid yw'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.4.3	Rhan 2, Tabl 4.11	Effeithiau o ryddhau halogyddion sydd ynghlwm wrth waddodion (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan bod samplu hanesyddol yng nghyffiniau Ardal Aráe Bosibl Mona wedi dangos bod lefelau halogyddion gwaddodion yn isel, ac y bydd gwaith samplu cemeg waddodion penodol i safle yn cael ei wneud yn ystod samplu rhynglanw. Ar yr adeg hon, a heb ganlyniadau gwaith samplu pellach, nid yw'r Arolygiaeth yn cytuno hepgor y mater hwn. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r effeithiau ar ecoleg pysgod a

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			physgod cregyn o ganlyniad i ryddhau halogyddion sydd ynghlwm wrth waddodion, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.
3.4.4	Rhan 2, Tabl 4.11 a Rhan 3, Tabl 4.12	Sŵn tanddwr o longau yn ystod pob cam. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Rhan 2, Tabl 4.11 a Rhan 3, Tabl 4.12 yn cyfiawnhau hepgor y mater hwn o ran y cam gweithredol yn unig, gan ddweud bod sŵn yn debygol o fod yn isel ac y byddai effeithiau'n digwydd dim ond petai rhywogaethau pysgod yn aros yn agos i longau (h.y. o fewn metrau) am nifer o oriau, sy'n annhebygol iawn. Nid yw'r Adroddiad Cwmpasu wedi rhoi unrhyw dystiolaeth i gefnogi'r honiad hwn ac nid yw wedi darparu rhesymeg i hepgor adeiladu a datgomisiynu. Er hynny, mae'r Arolygiaeth o'r farn bod effeithiau arwyddocaol yn annhebygol ac yn cytuno y gellir hepgor y mater hwn.
3.4.5	Rhan 2, Tabl 4.10 a Rhan 3, Tabl 4.11	Sŵn tanddwr yn ystod gweithredu. (Asedau cynhyrchu ac asedau trosglwyddo)	Nid yw'r Adroddiad Cwmpasu yn cynnig asesu'r mater hwn yn ystod y cam gweithredol. Mae'r Arolygiaeth yn nodi bod hyn yn cyferbynnu â'r cynnig i asesu aflonyddu ar famaliaid môr ar gyfer gweithgareddau eraill sy'n cynhyrchu sŵn yn ystod gweithredu, fel defnyddio ysgraffau jacio a allai gynhyrchu sŵn a dirgryniad tanddwr. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu dystiolaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol nad yw effeithiau arwyddocaol yn debygol o ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.4.6	Rhan 2, Tabl 4.16 a	Data bwrdd gwaith.	Ni chynigir unrhyw arolygon penodol i safle ar gyfer pysgod a physgod cregyn. Er bod yr Arolygiaeth yn cydnabod y ffynonellau data niferus sydd ar gael, nid yw eu perthnasedd i'r Datblygiad

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	Rhan 3, Tabl 4.7	(Asedau cynhyrchu ac asedau trosglwyddo)	Arfaethedig wedi cael ei esbonio'n glir. Mae'r Adroddiad Cwmpasu yn disgrifio canlyniadau arolygon a gynhaliwyd ar gyfer nifer o ffermydd gwynt alltraeth. Fodd bynnag, nid yw'r un o'r prosiectau hyn yn gorgyffwrdd â'r Datblygiad Arfaethedig yn ofodol ac mae nifer o'r setiau data y cynigiwyd eu defnyddio i lywio'r wybodaeth sylfaenol yn fwy na 10 mlwydd oed. Dylai'r Ymgeisydd sicrhau bod y data sylfaenol a ddefnyddir yn asesiadau'r Datganiad Amgylcheddol yn ddigon cyfredol i ddarparu gwybodaeth sylfaenol gadarn. Os bwriedir defnyddio data sydd eisoes yn bodoli yn unig, dylai'r Datganiad Amgylcheddol roi tystiolaeth i gyfiawnhau ei fod yn nodweddu'r amgylchedd sy'n derbyn yn gryf, gan gyfeirio at ddyddiad, cyfnod tymhorol a chwmpas daearyddol y data. Dylai'r defnydd o ddata presennol gael ei wneud gyda chytundeb ymgyngoreion.
3.4.7	Rhan 2, Tabl 4.9 a Rhan 3, Tabl 4.10	Rhywogaethau a warchodir. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Rhan 2, Tabl 4.9 a Rhan 3, Tabl 4.10 yn amlygu rhywogaethau pysgod a physgod cregyn fel cynefinoedd o brif bwysigrwydd yn Lloegr o dan Ddeddf yr Amgylchedd Naturiol a Chymunedau Gwledig (NERC) 2006. Dylai'r Ymgeisydd sicrhau y cyfeirir at ddeddfwriaeth berthnasol Cymru yn y Datganiad Amgylcheddol, a bod pysgod morol a restrir fel Rhywogaethau Blaenoriaeth o dan Adran 7 Deddf yr Amgylchedd (Cymru) 2016 yn cael eu cynnwys.
3.4.8	Rhan 2, Tabl 4.10 a Rhan 3, Tabl 4.11	Sŵn tanddwr. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Datblygiad Arfaethedig yn gorgyffwrdd ag ardaloedd silio dwysedd uchel ar gyfer sawl rhywogaeth bysgod, gan gynnwys penfreision, sy'n rhywogaeth sy'n clywed. Dylid asesu'r potensial i sŵn gosod seilbyst amharu ar weithgarwch silio ar gyfer penfras a rhywogaethau eraill sy'n clywed.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.4.9	Rhan , Adran 4.2.6 a Rhan 3, Adran 4.2.6	Lliniaru. (Asedau cynhyrchu ac asedau trosglwyddo)	Dylai'r Ymgeisydd ystyried rheoli amser y gweithgareddau adeiladu a / neu weithredol arfaethedig er mwyn osgoi cyfnodau allweddol a sensitif i rywogaethau, fel tymhorau silio pysgod a chyfnodau mudo pysgod. Pan ystyrir nad yw hyn yn angenrheidiol nac yn ymarferol, dylid ei gyfiawnhau yn y Datganiad Amgylcheddol.
3.4.10	dd/b	Niwed uniongyrchol. (Asedau cynhyrchu ac asedau trosglwyddo)	Nid yw'r Adroddiad Cwmpasu yn ystyried y potensial ar gyfer niwed uniongyrchol i rywogaethau. Er bod yr Arolygiaeth yn cydnabod bod pysgod yn dderbynnydd symudol yn gyffredinol, mae gan rai rhywogaethau gysylltiad agos â gwely'r môr (e.e. llymrïaid a phenwaig) ac fe allent fod yn ddibynnol ar gynefin penodol yn ystod rhan o'u cyfnodau bywyd. Yn ogystal, mae gallu rhywogaethau pysgod cregyn llonydd i symud er mwyn osgoi perygl yn gyfyngedig. Felly, mae'r Arolygiaeth o'r farn y dylai niwed ac aflonyddu uniongyrchol ar rywogaethau pysgod a physgod cregyn dyfnforol a phelagig symudol gael eu cynnwys yn yr asesiad ar gyfer pob cam o'r datblygiad. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu dystiolaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol nad yw effeithiau arwyddocaol yn debygol o ddigwydd.
3.4.11	dd/b	Tiroedd bwydo pysgod ac ardaloedd gaeafu ar gyfer cramenogion. (Asedau cynhyrchu ac asedau trosglwyddo)	Nid yw'r Adroddiad Cwmpasu yn mynd i'r afael ag effeithiau posibl ar diroedd bwydo pysgod neu ardaloedd gaeafu ar gyfer cramenogion. Dylai'r Datganiad Amgylcheddol asesu'r effeithiau hyn lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.4.12	dd/b	Llongau'n gwrthdaro â heulgwn.	Dylai'r Datganiad Amgylcheddol asesu'r potensial i longau wrthdaro â heulgwn ac unrhyw effeithiau arwyddocaol sy'n debygol o ddigwydd.

3.5 Mamaliaid môr

Adroddiad Cwmpasu Rhan 2, Adran 4.3 (Asedau Cynhyrchu) a Rhan 3, Adran 4.3 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.5.1	Rhan 2, paragraff 4.3.4.18 a Rhan 3, paragraff 4.3.4.16	Dolffiniaid pigwyn. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan bod dolffiniaid pigwyn yn ymweld â Môr Iwerddon yn achlysurol yn unig ac ni amlygwyd unrhyw rai yn yr arolygon digidol o'r awyr. Mae'r Arolygiaeth o'r farn y dylai asesiad ansoddol lefel uchel gael ei gyflwyno yn y Datganiad Amgylcheddol, y dylid cytuno ar ei gwmpas gyda'r Gweithgor Arbenigol.
3.5.2	Rhan 2, paragraff 4.3.4.52 a Rhan 3, paragraff 4.3.4.50	Morloi cyffredin. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae morloi cyffredin wedi cael eu gweld yn yr arolygon digidol penodol i safle o'r awyr. Mae'r Adroddiad Cwmpasu yn datgan y deuir ar draws niferoedd isel o forloi cyffredin ar hyd arfordiroedd Cymru, ond eu bod yn bresennol mewn dwyseddau uchel o fewn yr ardal astudio mamaliaid môr ranbarthol. Nid yw'r Arolygiaeth yn cytuno y gellir hepgor morloi cyffredin o'r asesiad. Dylai'r Ymgeisydd gytuno ar gwmpas asesiad lefel uchel ar gyfer y rhywogaeth hon gyda'r Gweithgor Arbenigol.
3.5.3	Rhan 2, Tabl 4.16 a Rhan 2, Tabl 4.17	Llygredd damweiniol yn ystod pob cam. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn cynnig hepgor llygredd damweiniol sy'n deillio o bob cam o'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol a'r Cynllun Wrth Gefn Llygredd Morol (MPCP) sy'n rhan ohono. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.5.4	Rhan 2, Tabl 4.16 a Rhan 3, Tabl 4.17	Mwy o waddodion crog a rhyddhau gwaddodiad yn gysylltiedig â hynny yn ystod pob cam. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan y gwyddys bod mamaliaid môr yn chwilota am fwyd mewn ardaloedd llanw lle mae'r dŵr yn afloyw a gweledegdd yn wael, a bod amrywioldeb naturiol mawr o ran gwaddodion crog yn yr ardal astudio. Mae'n nodi ymhellach y disgwylir i waddodion wasgaru'n gyflym yn ystod un gwyriad llanw. Mae'r Arolygiaeth yn cytuno bod yr effeithiau hyn yn annhebygol o arwain at effeithiau arwyddocaol ar famaliaid môr sy'n chwilota am fwyd ac felly gellir hepgor y mater hwn.
3.5.5	Rhan 2, Tabl 4.16 a Rhan 3, Tabl 4.17	Effaith meysydd electromagnetig (o geblau a osodwyd ar yr wyneb neu wedi'u claddu) yn ystod y cam gweithredu a chynnal a chadw. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Arolygiaeth yn nodi'r cyfeiriadau at lenyddiaeth sy'n dod i'r casgliad nad oes unrhyw dystiolaeth bod meysydd electromagnetig sy'n gysylltiedig â dyfeisiau ynni adnewyddadwy morol yn cael unrhyw effaith ar famaliaid môr, ac mae'n cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.5.6	Rhan 2, Tabl 4.16	Aflonyddu ar famaliaid môr o ganlyniad i sŵn gweithredu tyrbinau gwynt yn ystod y cam gweithredu a chynnal a chadw. (Asedau cynhyrchu)	Mae'r Arolygiaeth yn nodi'r cyfeiriadau at lenyddiaeth a gwaith monitro o ffermydd gwynt eraill sy'n dod i'r casgliad y byddai unrhyw effaith bosibl o dyrbinau gwynt gweithredol yn ddibwys. Fodd bynnag, dyddiad y rhain yw 2011 a 2014, ac mae allbwn a maint tyrbinau wedi cynyddu'n fawr ers hynny. Heb dystiolaeth y byddai gan y tyrbinau gwynt allbynnau sŵn cymaradwy, nid yw'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol. Mae'r Arolygiaeth o'r farn y dylid gwneud gwaith modelu sŵn tanddwr ar gyfer generaduron tyrbinau gwynt sydd o faint cynrychioliadol ar gyfer y Datblygiad Arfaethedig.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.5.7	Rhan 2, Adran 4.3.2 a Rhan 3, Adran 4.3.2	Ardal astudio. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Arolygiaeth yn nodi cyngor gan CNC, Natural England, y Cyd-bwyllgor Cadwraeth Natur (JNCC) a Llywodraeth Ynys Manaw (gweler Atodiad 2 y Farn hon) mai'r Uned Reoli Mamaliaid Môr (MMMU) yw'r raddfa briodol ar gyfer ystyried effeithiau rhanbarthol ar gyfer mamaliaid môr, yn hytrach nag ardal ddaearyddol Môr Iwerddon a gyflwynwyd, ac mae'n cynghori'r Ymgeisydd i ddefnyddio'r ardal astudio hon yn y Datganiad Amgylcheddol.
3.5.8	Rhan 2, paragraff 4.3.3.3	Arolygon penodol i safle. (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn esbonio bod arolygon mamaliaid môr digidol o'r awyr wedi casglu 30% o wyneb y môr a bod 12% wedi cael ei ddadansoddi. Dylai'r Datganiad Amgylcheddol esbonio'r sail resymegol wrth wraidd y gwerth 12% a dangos bod cwmpas yr arolwg yn briodol i ddarparu nodweddiad sylfaenol digonol. Dylai'r Datganiad Amgylcheddol gynnwys cyfeiriad at unrhyw gytundebau y daethpwyd iddynt trwy'r Gweithgor Arbenigol, gan gynnwys cyrff ymgynghori perthnasol fel CNC a Natural England.
3.5.9	Rhan 2, Tabl 4.12 a Rhan 3, Tabl 4.13	Data bwrdd gwaith. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae nifer o'r setiau data y bwriedir eu defnyddio i lywio'r ardal astudio mamaliaid môr ranbarthol (h.y. y tu allan i'r ardal arolwg penodol i safle) yn fwy na 10 mlwydd oed. Er y cydnabyddir bod arolygon penodol i safle wedi cael eu cynnal, dylai'r Ymgeisydd sicrhau bod y data sylfaenol a ddefnyddir yn asesiadau'r Datganiad Amgylcheddol yn ddigon cyfredol i ddarparu gwybodaeth sylfaenol gadarn. Dylai'r Datganiad Amgylcheddol ddefnyddio Cofrestrfa Sŵn Morol Defra fel y bo'n briodol.
3.5.10	Rhan 2, Tabl 4.15 a	Effeithiau posibl.	Dylai'r Datganiad Amgylcheddol asesu effeithiau ar ardaloedd bwydo, ardaloedd geni/safleoedd gorffwys ar y lan, ardaloedd meithrin a

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	Rhan 3, Tabl 4.16	(Asedau cynhyrchu ac asedau trosglwyddo)	llwybrau mudo neu gymudo hysbys mamaliaid môr lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.5.11	Rhan 2, Adran 4.3.6 a Rhan 3, Adran 4.3.6	Lliniaru. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r penodau ar yr agwedd Adareg Alltraeth (Rhan 2, Adran 4.4 a Rhan 3, Adran 4.4) yn cynnig Cynllun Rheoli Llongau (VMP) i gynnwys mesurau i leihau aflonyddu ar adar môr sy'n arnofio ar yr wyneb gymaint â phosibl. Dylai'r VMP hefyd amlinellu mesurau i leihau perygl gwrthdaro â mamaliaid môr.
3.5.12	Rhan 2, Adran 4.3.7 a Rhan 3, Adran 4.3.7	Methodoleg asesu arfaethedig. (Asedau cynhyrchu ac asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol ddisgrifio'r fethodoleg a ddefnyddiwyd yn llawn, gan gynnwys y Newid Trothwy Parhaol (PTS), y Newid Trothwy Dros Dro (TTS) a'r amrediadau aflonyddu a ddefnyddiwyd. Dylid nodi'r posibilrwydd y gallai'r olion traed effaith aflonyddu orgyffwrdd â ffin safleoedd alltraeth dynodedig, gan gynnwys ACA Gogledd Môn Forol. Os bydd gwaith modelu sŵn yn dangos bod yr ôl troed aflonyddu'n gorgyffwrdd â safle alltraeth dynodedig, bydd angen asesu ardal a hyd aflonyddu o'r fath yn erbyn amcanion cadwraeth y safle dynodedig.
3.5.13	Rhan 2, paragraff 4.3.8.2 a Rhan 3, paragraff 4.3.8.2	Effeithiau cronnol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan bod yr effaith gronnol allweddol yn debygol o ddod o sŵn tanddwr yn sgil gosod seilbyst. Nid yw'n glir p'un a fydd unrhyw un o'r llwybrau effaith eraill y bwriedir eu hasesu ar gyfer y prosiect ar ei ben ei hun yn cael eu hystyried yn yr asesiad effeithiau cronnol. Dylai'r Datganiad Amgylcheddol ddarparu rhestr o lwybrau sy'n cael eu sgrinio i mewn neu allan o'r Asesiad Effeithiau Cronnol (CIA), gyda sail resymegol i gefnogi sgrinio llwybrau allan.
3.5.14	Rhan 2, Adran	Effeithiau trawsffiniol.	Nid yw'r effeithiau posibl a restrir yn Adran 4.3.10 yn gyson â'r rhai hynny a restrir yn Rhan 2, Tabl 4.15 a Rhan 2, Tabl 4.16 (h.y. nid

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	4.3.10 a Rhan 3, Adran 4.3.10	(Asedau cynhyrchu ac asedau trosglwyddo)	ydynt yn cynnwys anaf i famaliaid môr o ganlyniad i wrthdaro â llongau ac aflonyddu o arolygon cyn-adeiladu). Mae'r Arolygiaeth o'r farn y dylai'r holl effeithiau posibl a amlygwyd i'r rhywogaethau symudol hyn dderbyn sylw yn yr asesiad o effeithiau trawsffiniol hefyd.

3.6 Adareg alltraeth

Adroddiad Cwmpasu Rhan 2, Adran 4.4 (Asedau Cynhyrchu) a Rhan 3, Adran 4.4 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.6.1	Rhan 2, Tabl 4.20 a Rhan 3, Tabl 4.20	Effeithiau aflonyddu a dadleoli uniongyrchol o ganlyniad i sŵn tanddwr yn ystod y camau gweithredu a chynnal a chadw a datgomisiynu. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Arolygiaeth yn nodi datganiadau croes yn yr Adroddiad Cwmpasu, gan fod Rhan 2 Tabl 4.19 a Rhan 3 Tabl 4.19 yn dweud bod y mater hwn ('aflonyddu a dadleoli o ganlyniad i sŵn tanddwr…') wedi'i gynnwys yn y camau gweithredu a chynnal a chadw a datgomisiynu. Fodd bynnag, mae Rhan 2, Tabl 4.20 a Rhan 3 Tabl 4.20 yn datgan bod 'Effeithiau aflonyddu a dadleoli uniongyrchol o ganlyniad i sŵn tanddwr yn ystod y camau gweithredu a chynnal a chadw a datgomisiynu' am gael eu hepgor. O ran yr asedau cynhyrchu, mae'r Arolygiaeth yn cytuno â'r farn, yn y sefyllfa annhebygol y byddai lefelau isel o sŵn yn arwain at ddadleoli adar i ffwrdd oddi wrth dyrbinau gwynt, y byddai'r effaith hon eisoes wedi derbyn sylw yn yr asesiad dadleoli gweithredol uwchben y dŵr. Felly, mae'r Arolygiaeth yn cytuno y gall sŵn tanddwr o ganlyniad i weithredu'r tyrbinau gwynt ar gyfer yr asedau cynhyrchu yn ystod y cam gweithredu a chynnal a chadw gael ei hepgor o'r asesiad. O ran yr asedau trosglwyddo, mae'r Arolygiaeth yn fodlon na fyddai sŵn tanddwr o weithgareddau gweithredu a chynnal a chadw yn arwain at effeithiau arwyddocaol, ac felly gellir hepgor y mater hwn. Dylai'r disgrifiad o'r datblygiad yn y Datganiad Amgylcheddol amlinellu'n glir y gweithgareddau cynnal a chadw ar gyfer yr asedau trosglwyddo i gefnogi'r safbwynt hwn. Mae'r Arolygiaeth yn cydnabod nad oes unrhyw waith gosod seilbyst wedi'i gynnig ar gyfer datgomisiynu'r asedau cynhyrchu na throsglwyddo. Fodd bynnag, mae Rhan 2, Tabl 3.5 yr Adroddiad Cwmpasu yn nodi aflonyddu posibl yn ystod datgomisiynu o ganlyniad

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			i dorri a thynnu ymaith sylfeini gorchuddiol neu seilbyst. Heb gyfiawnhad digonol o ran ffynonellau a lefelau tebygol sŵn tanddwr o weithgareddau datgomisiynu, mae'r Arolygiaeth o'r farn y dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r mater hwn, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.6.2	Rhan 2, Tabl 4.20 a Rhan 3, Tabl 4.20	Llygredd damweiniol yn ystod pob cam o Brosiect Ynni Gwynt Alltraeth Mona. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn cynnig hepgor llygredd damweiniol sy'n deillio o bob cam o'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol a'r Cynllun Wrth Gefn Llygredd Morol (MPCP) sy'n rhan ohono. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.
3.6.3	Rhan 3, Tabl 4.20	Perygl gwrthdaro yn ystod y cam gweithredu a chynnal a chadw. (Asedau trosglwyddo)	Mae'r Arolygiaeth yn cytuno bod perygl adar yn gwrthdaro â strwythurau'r orsaf hybu alltraeth yn annhebygol, ac felly mae'n fodlon hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.6.4	Rhan 3, Tabl 4.20	Rhwystr rhag symud yn ystod y cam gweithredu a chynnal a chadw. (Asedau trosglwyddo)	Er bod yr Adroddiad Cwmpasu yn datgan y disgwylir y bydd yr orsaf hybu alltraeth (os bydd ei hangen) yn cael ei lleoli o fewn Ardal Chwilio Cwmpasu Seilwaith Trosglwyddo Alltraeth Mona tua phwynt canol y coridor cebl allforio alltraeth, mae hefyd yn cydnabod nad yw'r lleoliad yn hysbys eto. Pe byddai'r orsaf hybu alltraeth yn cael ei lleoli'n agos i'r tyrbinau gwynt, fe allai ychwanegu ar y cyd at rwystr posibl rhag symud. Heb gyfiawnhad digonol ar yr adeg hon, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r mater hwn, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.6.5	Rhan 2, Paragraffau 4.4.2.1 i 4.4.2.4, 4.4.3.2 a Ffigur 4.21	Ardal astudio. (Asedau cynhyrchu)	Mae'r Arolygiaeth yn cynnig amrediad (4km i 10km) o fewn yr ardal astudio arfaethedig ar gyfer y bennod ar yr agwedd adareg alltraeth. Dylai'r Datganiad Amgylcheddol ddatgan yn glir a chyfiawnhau'r ardal astudio derfynol a fabwysiadir yn yr asesiad o effaith. Dylai hefyd gael ei hategu gan ffigur(au) sy'n dangos yn glir maint y glustogfa a lle mae'r pellteroedd clustogfa hyn yn wahanol. Dylai'r ardal astudio gael ei seilio ar y Parth Dylanwad (ZoI) ar gyfer y Datblygiad Arfaethedig. Cyfeirir sylw'r Ymgeisydd at y 'Cyngor Dros Dro SNCB1 ar y Cyd ar drin dadleoli trochyddion gyddfgoch (2022)' a gyhoeddwyd yn ddiweddar ynglŷn â chanllawiau diwygiedig ar ddadleoli trochyddion gyddfgoch. Mae'r Arolygiaeth yn cynghori y dylai'r ardal astudio adareg forol gynnwys ardal yr aráe a chlustogfa 10km o leiaf. Lle nad yw'r glustogfa'n cyrraedd 10km yn gyson, dylai'r Datganiad Amgylcheddol gyfiawnhau'r dull.
3.6.6	Rhan 2, Tabl 4.17	Ffynonellau data. (Asedau cynhyrchu)	Dylai astudiaethau olrhain gael eu defnyddio hefyd i lywio a dangos tystiolaeth o gysylltedd (neu ddiffyg cysylltedd) ar gyfer yr asesiad o'r effaith ar adareg forol, pan fo ar gael, fel data olrhain penodol i safle ar gyfer huganiaid gogleddol yng Ngwales, adar drycin Manaw ar Skomer ac Ynysoedd Copeland, gwylanod coesddu ar Rockabill, a gwylogod ar Ynys Canna.
3.6.7	Rhan 2, Adran 4.4.4	Yr amgylchedd sylfaenol. (Asedau cynhyrchu)	Dylai'r Datganiad Amgylcheddol ystyried yr adar hynny a restrir yn Atodlen 1 Deddf Bywyd Gwyllt 1990 (Ynys Manaw) a chyfeirio at Adar Manaw o Bryder Cadwraeth (2021) wrth ystyried statws cadwraeth adar Manaw (lle y bo'n berthnasol).
3.6.8	Rhan 2, Paragraff 4.4.3.2 a	Arolygon penodol i safle.	Mae'r Adroddiad Cwmpasu yn esbonio bod arolygon mamaliaid môr digidol o'r awyr wedi casglu 30% o wyneb y môr a bod 12% wedi cael ei ddadansoddi. Dylai'r Datganiad Amgylcheddol esbonio sut y

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	Rhan 3, Paragraffau 4.4.3.2 a 4.4.3.4	(Asedau cynhyrchu ac asedau trosglwyddo)	penderfynwyd ar yr arolygon digidol penodol i safle o'r awyr, gan gynnwys cyfiawnhad ar gyfer y gwerth dadansoddi 12% a dewis y pellter a'r aliniad trawslun. Dylai'r Datganiad Amgylcheddol ddangos yn glir bod cwmpas yr arolwg yn briodol i ddarparu nodweddiad sylfaenol digonol. Dylai'r Datganiad Amgylcheddol gynnwys cyfeiriad at unrhyw gytundebau y daethpwyd iddynt trwy'r Gweithgor Arbenigol gyda chyrff ymgynghori perthnasol fel CNC a Natural England. O ran yr asedau trosglwyddo, mae Rhan 3 yr Adroddiad Cwmpasu yn nodi na fwriedir cynnal mwy o arolygon digidol penodol i safle o'r awyr o ardal astudio adareg alltraeth Mona ar gyfer yr asedau trosglwyddo, oherwydd disgwylir y bydd y crynodiad adar a gofnodir yn ystod yr arolygon penodol i safle hyn yn y glustogfa 4km i 10km yn gynrychioliadol hefyd o fwyafrif yr ardaloedd morol o fewn yr ardal astudio ar gyfer yr asedau trosglwyddo. Dylai'r Ymgeisydd geisio cytuno ar gwmpas unrhyw arolygon pellach i lywio'r asedau trosglwyddo gyda'r Gweithgor Arbenigol, gan gynnwys CNC a Natural England.
3.6.9	Rhan 2, Ffigur 4.22	Safleoedd dynodedig (Asedau cynhyrchu)	Cyfeirir sylw'r Ymgeisydd at ymateb Llywodraeth Ynys Manaw yn Atodiad 2 i'r Farn hon o ran safleoedd dynodedig, ac yn enwedig Arsyllfa Adar Genedlaethol Calf of Man.
3.6.10	Rhan 2, Paragraff 4.4.4.11	Safleoedd dynodedig (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn bwriadu pennu cysylltedd rhwng cytrefi adar môr sy'n bridio mewn safleoedd dynodedig a'r Datblygiad Arfaethedig trwy gymhwyso'r metrig 'uchafswm cymedrig (yn ogystal ag un gwyriad safonol)'. Hyd nes bod yr arolygon penodol i safle wedi'u cwblhau, a bod y data wedi cael ei ddadansoddi'n derfynol, fe allai fod yn ochelgar cynnwys yr holl AGAau, safleoedd Ramsar a SoDdGAau sydd â nodweddion cymhwyso morol neu adar morydol yn

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			yr asesiad o'r effaith. Dylai'r Ymgeisydd geisio cytuno ar y metrig priodol gyda chyrff ymgynghori, gan gynnwys CNC a Natural England.
3.6.11	Rhan 2, Paragraffau 4.4.7.1 i 4.4.7.9 a Rhan 3, Paragraff 4.4.7.2	Methodoleg asesu. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan y gallai'r dull matrics dadleoli ar gyfer yr asedau trosglwyddo gael ei addasu (o ran y cyfraddau dadleoli a marwoldeb priodol) i asesu effaith dros dro bosibl aflonyddu yn ystod gosod y ceblau allforio alltraeth. Os bydd anghytundebau sylfaenol yn parhau ynglŷn â'r dulliau asesu a'r modelu ar gyfer asesu effeithiau o ddadleoli a marwolaeth cysylltiedig â gwrthdaro, dylai'r Datganiad Amgylcheddol gynnwys asesiadau wedi'u seilio ar y dull a ffefrir gan yr Ymgeisydd a'r rhai hynny a argymhellir gan CNC a Natural England. Cynghorir yr Ymgeisydd i gytuno ar y methodolegau asesu manwl gyda rhanddeiliaid perthnasol a gynrychiolir ar y Gweithgor Arbenigol adareg.
3.6.12	Rhan 2, Paragraff 4.4.7.3	Data uchder hedfan. (Asedau cynhyrchu)	Nid yw'n glir o'r Adroddiad Cwmpasu sut mae'r Ymgeisydd yn bwriadu pennu uchderau hedfan a ph'un a fydd hyn yn cael ei gymryd o'r data arolwg digidol o'r awyr yn unig. Fodd bynnag, mae'r Adroddiad Cwmpasu yn datgan y byddai gwybodaeth o'r fath yn cael ei chasglu 'lle y bo'n bosibl'. Dylai'r Datganiad Amgylcheddol gadarnhau'r dull a ddefnyddiwyd a hefyd ystyried defnyddio uchderau hedfan generig a gytunwyd gyda'r Gweithgor Arbenigol lle y bo'n bosibl.

3.7 Pysgodfeydd masnachol

Adroddiad Cwmpasu Rhan 2, Adran 5.1 (Asedau Cynhyrchu) a Rhan 3, Adran 5.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.7.1	Rhan 2, Tabl 5.3	Pellteroedd hwylio uwch yn ystod y cam gweithredu a chynnal a chadw. (Asedau cynhyrchu)	Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn ar y sail y bydd llongau pysgota'n gallu teithio trwy ardal yr arái, pan fydd yn weithredol, i/o ardaloedd pysgota cyfagos, ac felly nid yw effeithiau arwyddocaol yn debygol.
3.7.2	Rhan 3, Tabl 5.3	Ymyrryd â gweithgarwch pysgota (pob cam). (Asedau trosglwyddo)	Nid yw'r Adroddiad Cwmpasu yn rhoi tystiolaeth i gefnogi'r honiad y bydd gweithgareddau'n rhai dros dro a bod nifer y llongau sy'n ofynnol yn annhebygol o ychwanegu'n sylweddol at y traffig morol sydd eisoes yn bresennol. Mae Rhan 3, Ffigurau 5.6 a 5.7 yn dangos gwerthoedd glanio a gweithgarwch llongau. Mae'r rhain yn dangos amrywiad gofodol eithaf mawr ar draws yr ardal chwilio cwmpasu seilwaith trosglwyddo alltraeth. Felly, gallai maint yr effeithiau fod yn wahanol yn dibynnu ar leoliad terfynol y coridor cebl allforio a strwythurau cysylltiedig (fel yr is-orsaf Gwresogi, Awyru ac Aerdymheru (HVAC) alltraeth). Heb ddisgrifiad mwy diffiniedig o'r prosiect a gwybodaeth ychwanegol am hyd gweithgareddau a nifer y llongau, mae'r Arolygiaeth o'r farn ei bod yn rhy gynnar i hepgor y mater hwn ar gyfer y camau adeiladu a datgomisiynu). O ystyried nodweddion gweithredol a chynnal a chadw'r Datblygiad Arfaethedig, mae'r Arolygiaeth o'r farn y byddai nifer y llongau sy'n ofynnol ar gyfer gweithgareddau o'r fath yn annhebygol o arwain at effeithiau arwyddocaol, ac mae'n cytuno y gellir hepgor y mater ar gyfer y cam gweithredu a chynnal a chadw.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
	Rhan 3, Tabl 5.3	Pellteroedd hwylio uwch (pob cam). (Asedau trosglwyddo)	Mae'r Arolygiaeth yn cytuno bod cynnydd sylweddol mewn pellteroedd hwylio o ganlyniad i osod, cynnal a chadw, a datgomisiynu'r asedau trosglwyddo yn annhebygol. Felly, gellir hepgor y mater hwn.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygydd
3.7.3	Rhan 2, Adran 5.1.3 a Rhan 3, Adran 5.1.3	Llinell sylfaen. (Asedau cynhyrchu ac asedau trosglwyddo)	Wrth ddefnyddio data glanio, dylai unrhyw fesurau cadwraeth neu reolaeth ar gyfer rhywogaethau a ddelir yng nghyffiniau'r fferm wynt gael eu hystyried a'u cydnabod, oherwydd gallai hyn effeithio ar ddigonedd a dosbarthiad rhywogaethau o fewn ardal y fferm wynt. Dylai'r Ymgeisydd wneud ymdrech i gynnwys llongau sydd wedi'u heithrio o'r data Systemau Monitro Llongau, neu gyfrif amdanynt fel arall.
3.7.4	Rhan 2, Tabl 5.3	Dadleoli gweithgarwch pysgota i ardaloedd eraill. (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn nodi bod hyn yn effaith bosibl drwy gydol pob cam o'r datblygiad, ond mae'n datgan bod y dadleoli dros dro. Dylai'r Datganiad Amgylcheddol ddiffinio hyd effeithiau dros dro yn glir a gwahaniaethu rhwng effeithiau dros dro tymor byr go iawn a'r rhai hynny sy'n dymor hwy ac yn wrthdroadwy.
3.7.5	dd/b	Rhywogaethau estron goresgynnol.	Dylai'r Datganiad Amgylcheddol asesu'r potensial y gallai cyflwyno is-haen galed a symudiadau llongau hwyluso lledaeniad rhywogaethau estron goresgynnol (e.e. trwy ddŵr balast a thrwy ddamweiniau a gollyngiadau) a'r potensial ar gyfer effeithiau ar bysgodfeydd masnachol, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygydd
			Lle mae effeithiau arwyddocaol yn debygol o ddigwydd, dylai'r Datganiad Amgylcheddol hefyd ystyried y potensial i effeithiau cysylltiedig â'r newid yn yr hinsawdd hwyluso lledaeniad a gwaethygu effeithiau rhywogaethau estron goresgynnol.
3.7.6	dd/b	Effeithiau o ganlyniad i gynnydd mewn gweithgarwch llongau.	Nid yw'r bennod o'r Adroddiad Cwmpasu ar yr agwedd hon yn bwriadu asesu effeithiau o ganlyniad i gynnydd mewn gweithgarwch llongau, er enghraifft perygl gwrthdaro neu long yn taro yn erbyn gwrthrych sefydlog. Mae'r Arolygiaeth yn disgwyl i groesgyfeiriad priodol gael ei wneud i'r bennod o'r Datganiad Amgylcheddol ar Forgludiant a Mordwyaeth er mwyn sicrhau bod yr holl effeithiau posibl ar bysgodfeydd masnachol yn cael eu hasesu.

3.8 Morgludiant a mordwyaeth

Adroddiad Cwmpasu Rhan 2, Adran 5.2 (Asedau Cynhyrchu) a Rhan 3, Adran 5.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.8.1	dd/b	dd/b	Ni chynigiwyd hepgor unrhyw faterion o'r asesiad.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.8.2	Rhan 2, Adran 5.2.2 a Rhan 3, Adran 5.2.2	Ardal astudio. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae ardal astudio 10 môr-filltir (nm) wedi cael ei chynnig ar gyfer yr asesiad morgludiant a mordwyaeth. Dylai'r Datganiad Amgylcheddol esbonio'r sail resymegol i ddewis yr ardal astudio a, lle y bo'n bosibl, dylai'r dull gael ei drafod gyda'r cyrff ymgynghori perthnasol.
3.8.3	Rhan 2, Adran 5.2.4 a Rhan 2, Adran 5.2.4	Llinell sylfaen yn y dyfodol. (Asedau cynhyrchu ac asedau trosglwyddo)	Dylai'r Datganiad Amgylcheddol nodi llinell sylfaen yn y dyfodol ar gyfer symudiadau llongau ac esbonio sut y sefydlwyd hyn, gan ystyried defnyddwyr presennol y môr a'r prosiectau arfaethedig niferus yn y cyffiniau.
3.8.4	Rhan 2, Adran 5.2.6 a Rhan 3, Adran 5.2.6	Mesurau lliniaru. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Tŷ'r Drindod wedi awgrymu nifer o fesurau lliniaru risg (gweler Atodiad 2 y Farn hon), y cynghorir yr Ymgeisydd i'w hystyried ar gyfer y Datblygiad Arfaethedig.
3.8.5	Rhan 2, paragraff 5.2.7.10 a	Methodoleg asesu.	Mae'r Adroddiad Cwmpasu yn bwriadu pennu bod arwyddocâd naill ai'n dderbyniol at ei gilydd, yn oddefadwy, neu'n annerbyniol. Dylai'r Datganiad Amgylcheddol nodi'n glir sut mae'r dull asesu risg yn

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
	Rhan 3, paragraff 5.2.7.10	(Asedau cynhyrchu ac asedau trosglwyddo)	arwain at asesu arwyddocâd effaith sy'n gyson / yn gydnaws â'r derminoleg fel y'i hamlinellir yn Rhan 1, Adran 4.5.4 yr Adroddiad Cwmpasu.

3.9 Archaeoleg forol

Adroddiad Cwmpasu Rhan 2, Adran 5.3 (Asedau Cynhyrchu) a Rhan 3, Adran 5.3 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.9.1	Rhan 2, Tabl 5.9 a Rhan 3, Tabl 5.6	Newid patrymedd cludo gwaddodion – adeiladu a datgomisiynu. (Asedau cynhyrchu ac asedau trosglwyddo)	Bwriedir cynnwys y mater hwn fel y dangosir gan groes o dan y golofn 'cam', ond mae wedi'i gynnwys yn y bennod ar yr agwedd Prosesau Ffisegol (Rhan 2, Tabl 3.2 a Rhan 3, Tabl 3.3). Heb gyfiawnhad o ran effeithiau ar archaeoleg forol, nid yw'r Arolygiaeth yn cytuno y dylai'r mater hwn gael ei hepgor. Dylai'r Datganiad Amgylcheddol asesu unrhyw effeithiau ar asedau archaeolegol morol, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.9.2	Rhan 2, Adran 5.3.2 a Rhan 3, Adran 5.3.2	Ardal astudio.	Mae rhai o'r effeithiau posibl i'w hasesu yn deillio o newidiadau i brosesau ffisegol morol. Mae'r ardal astudio sydd i'w defnyddio ar gyfer yr asesiad archaeolegol morol yn wahanol i honno a fwriedir ar gyfer yr asesiadau o brosesau ffisegol. Dylai'r Datganiad Amgylcheddol gyfiawnhau maint yr ardal astudio a ddefnyddir yn yr asesiad archaeolegol morol, yng ngoleuni'r potensial ar gyfer effeithiau o brosesau ffisegol dros bellter ehangach.

3.10 Defnyddwyr eraill y môr

Adroddiad Cwmpasu Rhan 2, Adran 5.4 (Asedau Cynhyrchu) a Rhan 3, Adran 5.4 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.10.1	dd/b	dd/b	Ni chynigiwyd hepgor unrhyw faterion o'r asesiad.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.10.2	dd/b	dd/b	Dim sylwadau

3.11 Morlun, tirwedd ac adnoddau gweledol (Pynciau alltraeth ac ar y tir wedi'u cyfuno)

Adroddiad Cwmpasu Rhan 2, Adran 6.1 (Asedau Cynhyrchu) a Rhan 3, Adran 9.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.11.1	Rhan 3, Tabl 9.3	Effaith adeiladu, gweithredu a chynnal a chadw a datgomisiynu'r asedau cynhyrchu a throsglwyddo ar gymeriad y morlun a'r dirwedd ac adnoddau gweledol sydd wedi'u lleoli y tu hwnt i'r ardal astudio morlun, tirwedd a gweledol ar gyfer asedau cynhyrchu a throsglwyddo.	Mae'r Adroddiad Cwmpasu yn datgan bod yr ardal astudio i'w seilio ar Barth Gweledededd Damcaniaethol (ZTV) ac y byddai derbynyddion yn cael eu cytuno gyda rhanddeiliaid perthnasol ar gyfer asedau cynhyrchu a throsglwyddo. Dylai'r Ymgeisydd geisio cytuno ar faint y ZTV gyda chyrff ymgynghori perthnasol.
3.11.2	Rhan 3, Tabl 9.3	Effaith gweithredu a chynnal a chadw'r ceblau allforio alltraeth ac ar y tir ar gymeriad y morlun a'r dirwedd ac adnoddau gweledol.	Mae'r Arolygiaeth yn cydnabod y byddai ceblau allforio o dan y dŵr yn gyfan gwbl neu wedi'u claddu o dan y ddaear. Mae'r Arolygiaeth yn cytuno, yn gyffredinol, bod cyflwyno'r ceblau allforio yn annhebygol o arwain at effeithiau tymor hir arwyddocaol ar gymeriad y morlun a'r dirwedd ac adnoddau gweledol tra bod y Datblygiad Arfaethedig yn gweithredu. Fodd bynnag, nid yw'n glir p'un a fyddai unrhyw hawddfraint sy'n ofynnol yn arwain at newidiadau parhaol i'r dirwedd, a dylai'r potensial ar gyfer effeithiau o'r fath gael ei ystyried. Dylai'r Datganiad Amgylcheddol hefyd asesu'r potensial ar gyfer effeithiau tymor byr arwyddocaol yn ystod dechrau'r cam gweithredol, wrth i fesurau adfer arfaethedig aeddfedu ar hyd llwybr y cebl allforio.
3.11.3	Rhan 3, Tabl 9.3	Effaith datgomisiynu'r ceblau allforio alltraeth ac ar y tir ar gymeriad y morlun a'r dirwedd ac adnoddau gweledol.	Mae Rhan 1, paragraff 3.8.1.2 yr Adroddiad Cwmpasu yn disgwyl y byddai'r holl offer ceblau yn cael ei adael yn ei le pan fydd y Datblygiad Arfaethedig yn cael ei ddatgomisiynu. Fel y cyfryw, mae'r Arolygiaeth yn fodlon hepgor y mater hwn.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.11.4	Rhan 3, paragraff 9.1.8.6	Effaith gronnol gweithredu, cynnal a chadw a datgomisiynu'r ceblau allforio alltraeth ac ar y tir.	Ar y sail y byddai'r holl geblau o dan y dŵr yn gyfan gwbl neu o dan y ddaear yn ystod gweithredu ac y byddent yn cael eu gadael yn eu lle pan fyddai'r Datblygiad Arfaethedig yn cael ei ddatgomisiynu, mae'r Arolygiaeth yn fodlon bod effeithiau cronnol yn annhebygol o fod yn arwyddocaol. Felly, gellir hepgor y mater hwn.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.11.5	Rhan 3, paragraff 9.1.2.3	Ardal astudio.	Cynigir clustogfa 50km o ymyl allanol yr aráe tyrbinau gwynt. Dylid cyfiawnhau yn y Datganiad Amgylcheddol bod hyn yn ddigonol i amlygu unrhyw effeithiau arwyddocaol tebygol, yn seiliedig ar uchder y tyrbinau gwynt ar gyfer y Datblygiad Arfaethedig.
3.11.6	Rhan 3, paragraff 9.1.7.9	Aeddfedrwydd plannu.	Dylai'r Datganiad Amgylcheddol fanylu ar y lefelau sgrinio disgwyliedig a fyddai'n cael eu sefydlu o fewn amserlen 'sefydlu 10 mlynedd' plannu lliniarol a'r tybiaethau a wnaed yn hyn o beth.

3.12 Materion economaidd-gymdeithasol a chymunedol (Pynciau alltraeth ac ar y tir wedi'u cyfuno)

Adroddiad Cwmpasu Rhan 2, Adran 6.2 (Asedau Cynhyrchu) a Rhan 3, Adran 9.4 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.12.1	Rhan 3, Tabl 9.10	Effeithiau twristiaeth a chymunedol o fewn yr Ardal Effaith Genedlaethol (NIA).	Mae'r Arolygiaeth yn cytuno bod y Datblygiad Arfaethedig yn annhebygol o arwain at effeithiau arwyddocaol ar dwristiaeth a chymunedau ar lefel genedlaethol. Felly, gellir hepgor y mater hwn.
3.12.2	Rhan 3, 9.4.8.3	Effaith gronnol asedau trosglwyddo ar y tir yn ystod gweithredu.	Mae'r Adroddiad Cwmpasu yn nodi y byddai'r holl offer ceblau o dan y ddaear. Fel y cyfryw, mae'r Arolygiaeth yn fodlon hepgor y mater hwn. Nid yw'r Adroddiad Cwmpasu yn cyfeirio'n benodol at effeithiau cronnol posibl o weithredu'r asedau cynhyrchu. Fodd bynnag, nid yw'r Arolygiaeth o'r farn bod effeithiau arwyddocaol yn debygol, ac felly gellir hepgor y mater hwn hefyd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.12.3	Rhan 3, Tabl 9.9	Yr effaith ar dderbynyddion economaidd.	Er bod yr Arolygiaeth yn cydnabod y potensial ar gyfer effeithiau economaidd cadarnhaol ar gyflogaeth a'r gadwyn gyflenwi, dylai'r Datganiad Amgylcheddol hefyd amlygu ac asesu unrhyw effeithiau economaidd negyddol, er enghraifft ar bysgodfeydd masnachol, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

3.13 Hedfanaeth a radar

Adroddiad Cwmpasu Rhan 2, Adran 6.3 (Asedau Cynhyrchu) a Rhan 3, Adran 9.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.13.1	Rhan 2, Tabl 6.4	Tarfu posibl ar Brif Lwybrau Hofrenyddion (HMRs) o ganlyniad i bresenoldeb tyrbinau gwynt. (Asedau cynhyrchu)	Mae'r Arolygiaeth yn fodlon hepgor y mater hwn, gan nodi bod Rhan 2, Ffigur 6.3 yn dangos nad yw'r HMRs agosaf i'r Datblygiad Arfaethedig yn croesi ardal yr arále.
3.13.2	Rhan 2, Tabl 6.4 a Rhan 3, Tabl 9.6	Gallai cynnydd mewn traffig hofrenyddion effeithio ar y lle sydd ar gael i eraill yn yr awyr. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan y byddai'r Datblygiad Arfaethedig wedi'i leoli o fewn Dosbarth G (lle awyr heb ei reoli) lle mae peilotiaid yn gyfrifol am osgoi tir, rhwystrau ac awyrennau eraill a bod gwasanaeth traffig awyr ar gael. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn.
3.13.3	Rhan 2, Tabl 6.4	Tarfu ar radar meteorolegol. (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan bod y Datblygiad Arfaethedig y tu allan i barthau ymgynghori diffiniedig y Swyddfa Dywydd ar gyfer pob system radar meteorolegol. Mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.13.4	Rhan 2, Tabl 6.4	Effeithiau ar systemau Radar Goruchwylio Eilaidd (SSR). (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan nad oes unrhyw systemau SSR o fewn 10km o'r Datblygiad Arfaethedig. Mae'r Arolygiaeth o'r farn, yn unol â Chanllawiau'r Awdurdod Hedfan Sifil (CAA): *Polisi a Chanllawiau'r CAA ar Dyrbinau Gwynt*, bod ymyrraeth bosibl â systemau SSR yn annhebygol o fod yn arwyddocaol, ac felly mae'n cytuno y gellir hepgor y mater hwn.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.13.5	Rhan 3, Tabl 9.6	Tarfu posibl ar HMRs o ganlyniad i bresenoldeb y platfformau is-orsaf alltraeth (OSPs) neu'r is-orsaf hybu alltraeth. (Asedau trosglwyddo)	Er bod yr ardal astudio trosglwyddo yn gorgyffwrdd ychydig ag un HMR, mae'r Arolygiaeth yn fodlon y byddai ymgynghori rhwng yr hofrennydd a pherchennog y platfform yn golygu bod effeithiau arwyddocaol yn annhebygol o ddigwydd. Fel y cyfryw, gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.13.6	Rhan 2, Ffigur 6.3	Ardaloedd ymarfer ac ymarferion (PEXA). (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Rhan 2, Ffigur 6.3 yn amlygu ardaloedd PEXA o fewn yr ardal astudio, ond ni chynigir unrhyw asesiad o effeithiau ar yr ardaloedd hyn yn Rhan 2, Tabl 6.3. Dylai asesiad o'r effeithiau ar ardaloedd PEXA gael ei gynnal mewn ymgynghoriad â chyrff ymgynghori perthnasol, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.13.7	Rhan 2, Ffigur 6.2	Lle awyr uwchben Ardal Aráe Bosibl Mona. (Asedau cynhyrchu)	Nid yw'r gwahanol ddosbarthiadau lle awyr yn hawdd eu gweld yn Rhan 2, Ffigur 6.2. Dylai'r Datganiad Amgylcheddol gynnwys ffigurau clir sy'n dangos dosbarthiadau lle awyr.
3.13.8	Rhan 2, Tabl 6.3	Systemau radar – derbynyddion. (Asedau cynhyrchu)	Mae Rhan 2, paragraff 6.3.4.10 yn nodi bod Prif Radar Goruchwylio (PSR) Clee Hill o fewn amrediad gweithredol datganedig Ardal Aráe Bosibl Mona, ond mae'n datgan bod gwaith modelu llinell weledigaeth radar cychwynnol yn dangos efallai na fydd yn canfod tyrbinau gwynt, yn ddamcaniaethol. Mae Rhan 2, Tabl 6.3 yn hepgor y PSR hwn o'r asesiad arfaethedig. Mae Gwasanaethau Traffig Awyr Cenedlaethol (NATS) wedi amlygu bod angen asesiad ar gyfer y radar hwn (gweler Atodiad 2 y Farn hon).

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Mae NATS hefyd wedi amlygu bod y Datblygiad Arfaethedig wedi'i leoli o fewn yr ardal asesu ar gyfer Radar Claxby. Dylai asesiad o'r effeithiau arwyddocaol tebygol ar y systemau radar hyn gael ei gyflwyno yn y Datganiad Amgylcheddol.

3.14 Newid yn yr hinsawdd

Adroddiad Cwmpasu Rhan 2, Adran 6.4 (Asedau Cynhyrchu) a Rhan 3, Adran 9.3 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.14.1	Rhan 2, Tabl 6.7 a Rhan 3, Adran 9.3	Pa mor fregus yw'r asedau cynhyrchu a throsglwyddo i'r newid yn yr hinsawdd yn ystod y cam adeiladu, gweithredu a chynnal a chadw a datgomisiynu. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae Rhan 2, paragraff 6.4.1.4 yn bwriadu hepgor asesiad risg newid yn yr hinsawdd ar y sail y bydd y newid yn yr hinsawdd yn cael ei asesu mewn penodau pwnc perthnasol o'r Datganiad Amgylcheddol. Mae Rhan 2, Tabl 6.7 yn datgan y bydd perygl llifogydd i'r asedau trosglwyddo ar y tir yn cael ei asesu gan roi ystyriaeth briodol i'r newid yn yr hinsawdd o fewn Asesiad Risg Llifogydd (FRA) annibynnol ac y byddai elfennau alltraeth yn cael eu dylunio i wrthsefyll digwyddiadau storm. Cynigir hefyd y byddai systemau oeri'n cael eu dylunio gyda digon o gapasiti i ystyried y galw uwch am oeri'r offer o ganlyniad i'w newid yn yr hinsawdd. Mae'r Arolygiaeth yn fodlon y gall bregusrwydd y Datblygiad Arfaethedig i lifogydd gael ei asesu mewn FRA annibynnol, ar yr amod bod unrhyw effeithiau arwyddocaol tebygol yn cael eu hadrodd yn y Datganiad Amgylcheddol. Dylai'r Ymgeisydd sicrhau bod yr ystyriaethau mwyaf diweddar ynglŷn â'r newid yn yr hinsawdd yn cael eu hystyried yn asesiad yr Ymgeisydd. Fodd bynnag, ni fyddai'r FRA yn mynd i'r afael â bregusrwydd y Datblygiad Arfaethedig i risgiau eraill sy'n gysylltiedig â'r hinsawdd, er enghraifft amlder stormydd, cryfder y gwynt a chryfder ac uchder tonnau. Fel y cyfryw, mae'r Arolygiaeth o'r farn na ellir hepgor y mater hwn ar yr adeg hon. Dylai'r Datganiad Amgylcheddol asesu'r effeithiau arwyddocaol tebygol sy'n ymwneud â bregusrwydd y Datblygiad Arfaethedig i'r newid yn yr hinsawdd.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol hefyd ddisgrifio ac asesu'r capasiti addasol a ymgorfforwyd yn nyluniad y Datblygiad Arfaethedig (h.y. y systemau oeri).

3.15 Pynciau amgylcheddol eraill na chynigir pennod ar eu cyfer yn y Datganiad Amgylcheddol

Adroddiad Cwmpasu Rhan 2, Adran 7 (Asedau Cynhyrchu) a Rhan 3, Adran 10 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.15.1	Rhan 2, Adran 7.2.1 a Rhan 3, Adran 10.2.1	Iechyd dynol – pennod annibynnol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu hepgor pennod annibynnol ar Iechyd Dynol ar y sail y bydd effeithiau posibl ar iechyd dynol yn cael eu hasesu o fewn penodau eraill o'r Datganiad Amgylcheddol a bydd casgliad cyffredinol ynglŷn ag arwyddocâd effeithiau ar iechyd dynol yn cael ei gynnwys o fewn atodiad technegol. Mae'r Arolygiaeth yn fodlon nad oes angen i Iechyd Dynol gael ei ystyried fel pennod annibynnol.
3.15.2	Rhan 2, paragraff 7.2.1.1	Cwmpas effeithiau ar iechyd pobl sydd i'w hasesu. (Asedau cynhyrchu)	Mae'r Adroddiad Cwmpasu yn datgan y byddai effeithiau posibl ar iechyd sy'n deillio o'r asedau cynhyrchu yn cael eu hystyried yn y pynciau canlynol yn y Datganiad Amgylcheddol: • prosesau ffisegol; • pysgodfeydd masnachol; • morgludiant a mordwyaeth; • materion economaidd-gymdeithasol a chymunedol; a • defnyddwyr eraill y môr. Fodd bynnag, nid oes cyfeiriadau at asesu effeithiau ar iechyd dynol yn y penodau hyn ac ni roddir mwy o fanylion yn Rhan 2, Adran 7.2.1. Fel y cyfryw, nid yw'n glir i'r Arolygiaeth beth mae'r

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			Ymgeisydd yn bwriadu ei asesu. Dylai'r Ymgeisydd geisio cytuno ar gwmpas yr asesiad o effeithiau ar iechyd gydag ymgyngoreion perthnasol.
3.15.3	Rhan 3, paragraff 10.2.1.8	Iechyd dynol – effeithiau o'r cam gweithredol a chynnal a chadw. (Asedau trosglwyddo)	Mae Rhan 3, paragraff 10.2.1.8 yn bwriadu hepgor effeithiau sy'n deillio o: • allyriadau i'r aer; • allyriadau i ddŵr, tir a phridd; • risgiau halogiad i weithwyr neu'r cyhoedd; • newidiadau i fynediad i Hawliau Tramwy Cyhoeddus neu fannau agored; • cyfleoedd cyflogaeth. Mae'r Arolygiaeth yn fodlon bod effeithiau arwyddocaol ar iechyd yn annhebygol o ddigwydd o ganlyniad i'r effeithiau hyn yn ystod y cam gweithredu a chynnal a chadw, ac mae'n cytuno y gellir hepgor y materion hyn o'r Datganiad Amgylcheddol.
3.15.4	Rhan 3, Adran 10.2.1	Iechyd dynol – gwres. (Asedau trosglwyddo)	Mae'r Arolygiaeth yn cytuno bod yr asedau trosglwyddo'n annhebygol o gynhyrchu lefelau gwres sy'n debygol o gael effeithiau arwyddocaol ar iechyd dynol, ac mae'n cytuno y gellir hepgor y mater hwn.
3.15.5	Rhan 3, Adran 10.2.1	Iechyd dynol – ymbelydredd. (Asedau trosglwyddo)	Cynigir hepgor ymbelydredd (meysydd electromagnetig (EMF)) ar y sail bod y ffens ar hyd terfyn yr is-orsaf yn sgrinio'r maes electrig. Fodd bynnag, mae'r Datblygiad Arfaethedig hefyd yn cynnwys hyd at 12 o geblau allforio ar y tir hyd at 275kV a hyd at 12 o geblau allforio cysylltiad â'r grid hyd at 400kV, nad yw eu coridorau ceblau arfaethedig wedi'u cadarnhau eto. At hynny, mae paragraff 2.4.5.1 yn datgan bod gofyniad posibl am

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			gysylltiad 400kV i gysylltu'r is-orsaf newydd arfaethedig ag is-orsaf bresennol y Grid Cenedlaethol ym Modelwyddan. Yn unol â chanllawiau perthnasol (yr Adran Ynni a Newid Hinsawdd (DECC) Llinellau Pŵer: Dangos cydymffurfiaeth â chanllawiau amlygiad cyhoeddus EMF, Cod Ymarfer Gwirfoddol 2012), gallai ceblau uwchben ac islaw'r ddaear sy'n uwch na 132kV achosi effeithiau EMF. Heb wybodaeth, gan gynnwys lleoliad coridor y ceblau a derbynyddion sensitif, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y mater hwn ar yr adeg hon. Dylai'r Datganiad Amgylcheddol ddangos y mesurau dylunio a ddefnyddiwyd i osgoi'r posibilrwydd o effeithiau EMF ar dderbynyddion o'r holl elfennau ar y tir, gan gynnwys ceblau uwchben a chladdedig a'r is-orsaf.
3.15.6	Rhan 2, Adran 7.2.2 a Rhan 3, Adran 10.2.2	Gwastraff – pennod annibynnol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu cyflwyno Cynllun Rheoli Gwastraff (y cyfeirir ato fel y Cynllun Rheoli Gwastraff Safle (SWMP) yn Rhan 3 yr Adroddiad Cwmpasu) fel atodiad technegol i'r Datganiad Amgylcheddol y byddai'n ofynnol i gontractwyr ei ddilyn. Byddai hefyd yn amlygu'r gwastraff sy'n debygol o ddeillio o adeiladu'r asedau cynhyrchu ac yn amlinellu mesurau priodol i reoli'r gwastraff yn unol â'r egwyddor hierarchaeth wastraff. Mae'r Arolygiaeth yn cytuno, yn seiliedig ar natur y Datblygiad Arfaethedig, bod effeithiau arwyddocaol o ganlyniad i waredu ac adfer gwastraff yn ystod adeiladu yn annhebygol o ddigwydd ac y gellir hepgor pennod annibynnol ar wastraff.
~~3.15.7~~	Rhan 2, Adran 7.2.2 a Rhan 3,	Gwastraff gweithredol. (Asedau cynhyrchu ac asedau trosglwyddo)	Bwriedir hepgor gwastraff gweithredol ar y sail y bydd gweithredu a chynnal a chadw'r Datblygiad Arfaethedig yn cynhyrchu symiau cyfyngedig yn unig o wastraff. Mae hefyd yn datgan y bydd gweithdrefnau casglu gwastraff yn cael eu

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
	Adran 10.2.2		cynnwys mewn Cynllun Rheoli Gweithredol. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn.

Rhif Adnabod	Cyf	Agweddau y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.15.8	Rhan 2, Adran 7.3.2 a Rhan 3, Adran 10.3.1	Cyd-destun polisi cynllunio lleol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu hepgor pennod annibynnol ar Bolisi Cynllunio Lleol ar y sail y bydd disgrifiad o'r broses gydsynio yn cael ei amlinellu yn y penodau cyflwyniadol ac y bydd deddfwriaeth berthnasol a chyd-destun polisi cynllunio yn cael eu hamlinellu ym mhob un o'r penodau agwedd. Bydd Datganiad Cynllunio yn cael ei ddarparu hefyd. Mae'r Arolygiaeth yn fodlon â'r dull hwn.
3.15.9	Rhan 2, Adran 7.3.3 a Rhan 3, Adran 10.3.2	Golau dydd, golau'r haul a microhinsawdd. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu hepgor golau dydd, golau'r haul a microhinsawdd ar y sail bod lleoliad yr asedau cynhyrchu a'r ffaith nad yw elfennau'r asedau trosglwyddo sydd uwchben y ddaear yn cynnwys adeiladau uchel yn golygu ei bod yn annhebygol y byddai effeithiau arwyddocaol yn digwydd o ran yr agweddau hyn. Mae'r Arolygiaeth wedi ystyried nodweddion y Datblygiad Arfaethedig ac mae'n fodlon y gellir hepgor yr agweddau hyn ar y sail bod effeithiau arwyddocaol yn annhebygol o ddigwydd.
3.15.10	Rhan 2, Adran 7.3.4	Gwres (Asedau cynhyrchu)	Mae'r Ymgeisydd yn bwriadu hepgor gwres ar y sail nad yw'r asedau cynhyrchu'n debygol o gynhyrchu lefelau sylweddol o wres. Dywedir y bydd mesurau dylunio technegol yn atal gwres rhag cael ei gynhyrchu o'r orsaf hybu alltraeth. Mae'r Arolygiaeth

Rhif Adnabod	Cyf	Agweddau y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			yn cytuno y gellir hepgor y mater hwn. Dylai'r disgrifiad o'r datblygiad yn y Datganiad Amgylcheddol esbonio'r mesurau dylunio sy'n rheoli cynhyrchu gwres.
3.15.11	Rhan 2, Adran 7.3.4	Ymbelydredd. (Asedau cynhyrchu)	Mae'r Ymgeisydd yn bwriadu hepgor pennod annibynnol ar ymbelydredd ar y sail y bydd effeithiau sy'n ymwneud â meysydd trydanol a magnetig (EMFs) o'r orsaf hybu alltraeth a cheblau rhyng-aráe yn cael eu hystyried ym mhenodau'r Datganiad Amgylcheddol ar Ecoleg Fenthig a Physgod a Physgod Cregyn. Mae'r Arolygiaeth yn fodlon nad oes angen pennod annibynnol, ond fel y nodwyd yn Adran 3.3 y Farn hon, nid yw'n cytuno y gellir hepgor y mater hwn.

Rhif Adnabod	Cyf	Agweddau y cynigir ymdrin â nhw mewn rhannau eraill o'r Datganiad Amgylcheddol	Sylwadau'r Arolygiaeth
3.15.12	Rhan 2, Adran 7.4.2 a Rhan 3, Adran 10.4.1	Gweddillion ac allyriadau eraill. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu hepgor gweddillion ac allyriadau eraill (e.e. llwch, llygrwyr, golau, sŵn, dirgryniad) fel pennod annibynnol ar y sail y bydd y materion hyn yn cael eu hystyried mewn penodau eraill o'r Datganiad Amgylcheddol. Mae'r Arolygiaeth yn fodlon â'r dull hwn.
3.15.13	Rhan 2, paragraff 7.4.3 a Rhan 3,	Asedau materol. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Ymgeisydd yn bwriadu hepgor pennod annibynnol ar Asedau Materol ar y sail y bydd hyn yn cael ei ystyried mewn penodau eraill o'r Datganiad Amgylcheddol. Mae'r Arolygiaeth yn fodlon â'r dull hwn.

Rhif Adnabod	Cyf	Agweddau y cynigir ymdrin â nhw mewn rhannau eraill o'r Datganiad Amgylcheddol	Sylwadau'r Arolygiaeth
	paragraff 10.4.2		
3.15.14	Rhan 2, Adran 7.4.4 a Rhan 3, Adran 10.4.2.3	Damweiniau mawr a thrychinebau. (Asedau cynhyrchu ac asedau trosglwyddo)	Mae'r Adroddiad Cwmpasu yn datgan na fydd Damweiniau Mawr a Thrychinebau yn cael eu hystyried fel pennod annibynnol. Yn lle hynny, fe'u cynhwysir mewn penodau eraill perthnasol o'r Datganiad Amgylcheddol, fel y disgrifir yn Rhan 2, Adran 7.4.4 a Rhan 2, Adran 10.4.2.3. Cynigir hefyd y bydd y mesurau dylunio a ddefnyddir i osgoi damweiniau mawr a thrychinebau yn cael eu disgrifio yn y bennod Disgrifiad o'r Prosiect yn y Datganiad Amgylcheddol. Mae'r Arolygiaeth yn fodlon nad oes angen i ddamweiniau mawr a thrychinebau gael eu hasesu o fewn pennod annibynnol. Fodd bynnag, mae'r Arolygiaeth yn nodi'r canlynol: • Mae Rhan 2, paragraff 7.4.4.3 a Rhan 3, paragraff 10.2.7 yn datgan y bydd damweiniau mawr a thrychinebau sy'n ymwneud â bregusrwydd y Datblygiad Arfaethedig i'r newid yn yr hinsawdd yn cael eu hasesu yn y bennod ar y Newid yn yr Hinsawdd, ac eto bwriedir hepgor y mater hwn yn Rhan 2, Tabl 6.7. • Mae'r Awdurdod Gweithredol Iechyd a Diogelwch (HSE) wedi amlygu nifer o Biblinellau Perygl Damwain Fawr a Gosodiadau Perygl Mawr yn yr Ardal Chwilio Cwmpasu Seilwaith Trosglwyddo Ar y Tir (gweler Atodiad 2 y Farn hon). Mae'n rhaid i'r Ymgeisydd sicrhau bod unrhyw effeithiau arwyddocaol tebygol o'r materion uchod yn cael eu hasesu yn y Datganiad Amgylcheddol.

3.16 Daeareg, hydroddaeareg ac amodau tir

Adroddiad Cwmpasu Rhan 3, Adran 6.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.16.1	Rhan 3, Tabl 6.3	Effaith gollyngiadau damweiniol / rhyddhau halogyddion ar ansawdd derbynyddion dŵr daear ar y ddaear yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Adroddiad Cwmpasu yn bwriadu hepgor llygredd damweiniol sy'n deillio o adeiladu, gweithredu a datgomisiynu'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.16.2	Rhan 3, paragraffau 6.1.3.1 i 6.1.4.6	Methodoleg asesu.	Nid yw'r Adroddiad Cwmpasu yn cynnig unrhyw ymchwiliadau safle ymwthiol i lywio'r wybodaeth sylfaenol, gan ddibynnu ar ffynonellau desg yn lle hynny. Mae'r Arolygiaeth o'r farn efallai na fydd cyfyngu'r dull i astudiaeth ddesg yn unig yn darparu gwybodaeth sylfaenol ddigonol i lywio'r asesiad. Cynghorir yr Ymgeisydd i drafod a chytuno ar yr angen am ymchwiliad safle ymwthiol gyda CNC a'r awdurdod lleol perthnasol.
3.16.3	Rhan 3, Adran 6.2.6	Lliniaru.	Dylai'r Ymgeisydd ystyried p'un a oes angen Cynllun Rheoli Deunyddiau (MMP) ac, os felly, ystyried defnyddio'r Diffiniad o Wastraff: Cod Ymarfer (DOW:COP) Tir Halogedig: Ceisiadau

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			mewn Amgylcheddau Go Iawn (CL:AIRE) a'r broses safle rhoi / derbyn.

3.17 Hydroleg a pherygl llifogydd

Adroddiad Cwmpasu Rhan 3, Adran 6.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.17.1	Rhan 3, Tabl 6.9	Effaith dŵr ffo halogedig ar statws cemegol a biolegol derbynyddion dŵr wyneb sy'n deillio o weithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Arolygiaeth yn cytuno bod gweithgareddau gweithredu a chynnal a chadw yn annhebygol o gynhyrchu dŵr ffo halogedig, ac felly bydd potensial isel ar gyfer effeithiau arwyddocaol tebygol o ran llygredd. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o asesiad pellach.
3.17.2	Rhan 3, Tabl 6.9	Effaith gollyngiadau damweiniol / rhyddhau halogyddion ar ansawdd derbynyddion dŵr wyneb a daear yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Adroddiad Cwmpasu yn bwriadu hepgor llygredd damweiniol sy'n deillio o adeiladu, gweithredu a datgomisiynu'r Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru effeithiau o'r fath trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Amgylcheddol. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.
3.17.3	Rhan 3, Tabl 6.9	Effaith perygl uwch o lifogydd sy'n deillio o ddifrod i amddiffynfeydd presennol rhag llifogydd yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Arolygiaeth yn cytuno bod gweithgareddau gweithredu a chynnal a chadw yn annhebygol o arwain at effeithiau arwyddocaol ar gyfanrwydd amddiffynfeydd presennol rhag llifogydd ac y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.17.4	Rhan 3, Tabl 6.9	Effaith perygl uwch o lifogydd sy'n deillio o ddŵr ffo wyneb ychwanegol yn ystod gweithredu	Mae'r Adroddiad Cwmpasu yn datgan bod y cynnydd bach mewn tir anathraidd sy'n gysylltiedig â'r asedau trosglwyddo ar y tir yn annhebygol o arwain at effeithiau arwyddocaol tebygol yn ymwneud â phatrymau draenio a chyfraddau dŵr ffo wyneb.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
		a chynnal a chadw'r cebl allforio ar y tir.	Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol ar y sail hon.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.17.5	Rhan 3, Tabl 6.8	System ddraenio gynaliadwy (SuDS).	Os bydd y Datblygiad Arfaethedig yn rhoi SuDS ar waith yn ystod y cam adeiladu, gweithredu neu ddatgomisiynu, e.e. wrth yr is-orsaf ar y tir, dylai lleoliad a dyluniad y SuDS gael eu disgrifio yn y Datganiad Amgylcheddol a'u cynnwys ar ffigur(au).
3.17.6	Rhan 3, Tabl 6.8	Amddiffynfeydd presennol rhag llifogydd.	Mae Cyngor Bwrdeistref Sirol Conwy a Chyngor Sir Ddinbych wedi nodi bod ceisiadau yn yr arfaeth ar gyfer cynlluniau amddiffyn arfordirol ar hyd morlin Gogledd Cymru (gweler Atodiad 2 y Farn hon). Dylai'r Ymgeisydd ystyried y potensial ar gyfer effeithiau cronnol gyda'r ceisiadau hyn neu a ydynt yn ffurfio rhan o'r wybodaeth sylfaenol yn y dyfodol.

3.18 Ecoleg ddaearol ac adar rhynglanw

Adroddiad Cwmpasu Rhan 3, Adran 7.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.18.1	Rhan 3, Tabl 7.4	Effaith colli cynefin dros dro ac yn barhaol ar gynefinoedd a rhywogaethau a warchodir yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Ar sail natur a graddfa fach debygol y cynefin a fyddai'n cael ei golli yn sgil gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir, mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn o'r asesiad.
3.18.2	Rhan 3, Tabl 7.4	Effaith llygredd a achosir gan ollyngiadau damweiniol / rhyddhau halogyddion ar gynefinoedd a rhywogaethau a warchodir yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Adroddiad Cwmpasu yn bwriadu hepgor gollyngiadau damweiniol / rhyddhau halogyddion o weithgareddau gweithredu a chynnal a chadw ar gyfer y Datblygiad Arfaethedig. Mae'r Arolygiaeth yn cytuno y gellir lliniaru'r effeithiau hyn trwy arferion rheoli safonol ac y gellir eu hepgor o'r asesiad. Dylai'r Datganiad Amgylcheddol roi manylion y mesurau lliniaru arfaethedig sydd i'w cynnwys yn y Cynllun Rheoli Ecolegol. Dylai'r Datganiad Amgylcheddol hefyd esbonio sut y bydd mesurau o'r fath yn cael eu sicrhau.
3.18.3	Rhan 3, Tabl 7.4	Effaith adeiladu, gweithredu a chynnal a chadw a datgomisiynu'r asedau trosglwyddo ar y tir ar rywogaethau nad ydynt wedi'u rhestru ym mharagraff 7.1.3.4 yr Adroddiad Cwmpasu AEA hwn, gan gynnwys gwiwerod	Mae'r cyfiawnhad ar gyfer hepgor effeithiau ar rywogaethau o'r fath yn dibynnu ar osgoi lleiniau mawr o goetir a phrif gyrsiau dŵr, ynghyd â defnyddio technegau adeiladu sy'n ystyriol o'r amgylchedd (fel Drilio Cyfeiriadol Llorweddol (HDD)), a natur dros dro aflonyddu ar gynefin a gofynion adfer. Gan nad yw'r llwybr tebygol ar gyfer trosglwyddo ar y tir ac felly presenoldeb/absenoldeb tebygol rhywogaethau o'r fath y gallai'r Datblygiad Arfaethedig effeithio arnynt yn hysbys eto, ac ni wyddys eto p'un a fydd technegau fel HDD yn ymarferol ym mhob lleoliad, nid yw'r Arolygiaeth yn cytuno y gellir hepgor

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
		coch, ysgyfarnogod brown, pysgod, ac infertebratau dyfrol.	effeithiau ar rywogaethau (fel y rhai hynny a restrir yn Rhan 3, Tabl 7.4 ac nid ym mharagraff 7.1.3.4) o'r asesiad ar yr adeg hon. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o dderbynyddion/nodweddion ecolegol pwysig, lle y gallai effeithiau arwyddocaol tebygol ddigwydd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.18.4	Rhan 3, Paragraffau 7.1.3.4 i 7.1.3.5	Methodolegau arolygu.	Mae'r Adroddiad Cwmpasu yn cadarnhau y bydd cwmpas manwl, methodolegau a graddau'r arolygon penodol i safle a amlygwyd yn cael eu cytuno gyda CNC cyn i'r arolygon ddechrau. Dylai'r Datganiad Amgylcheddol ddarparu sail resymegol glir a chyfiawnhad ynglŷn â'r dull o gynnal yr arolygon a ddefnyddir i lywio'r asesiad, gan gynnwys cyfeirio at gytundebau y daethpwyd iddynt gyda chyrff ymgynghori perthnasol, fel CNC.
3.18.5	Rhan 3, Tabl 7.1 a Pharagraff 7.1.3.4	Ffynonellau data ac arolygon – madfallod dŵr cribog (GCN)	Cyfeirir sylw'r Ymgeisydd at y sylwadau a wnaed gan Gyngor Sir Ddinbych yn Atodiad 2 i'r farn hon o ran poblogaethau GCN sy'n bwysig yn genedlaethol yn ardal Llanelwy/Bodelwyddan o ogledd-ddwyrain Cymru. Anogir yr Ymgeisydd i ymgynghori ag ecolegwyr yr awdurdod lleol ynglŷn â ffynonellau data a chwmpas yr arolygon ecolegol, i sicrhau bod materion bioamrywiaeth rhanbarthol a lleol yn derbyn sylw'n ddigonol yn y Datganiad Amgylcheddol, yn enwedig y cynefinoedd a'r rhywogaethau hynny a restrir yn y Cynllun Gweithredu Bioamrywiaeth Lleol perthnasol, ac

			ardaloedd yr ystyrir eu bod yn bwysig i warchod amrywiaeth fiolegol yng Nghymru.
3.18.6	dd/b	Atodiadau cyfrinachol.	Mae gan gyrff cyhoeddus gyfrifoldeb i osgoi rhyddhau gwybodaeth amgylcheddol a allai achosi niwed i nodweddion ecolegol sensitif neu fregus. Dylai data arolwg ac asesu penodol yn ymwneud â phresenoldeb a lleoliadau rhywogaethau fel moch daear, adar a phlanhigion prin a allai fod yn agored i aflonyddu, difrod, erledigaeth, neu gamfanteisio masnachol o ganlyniad i gyhoeddi'r wybodaeth, gael ei ddarparu yn y Datganiad Amgylcheddol fel atodiad cyfrinachol. Dylai'r holl wybodaeth asesu arall gael ei chynnwys mewn pennod o'r Datganiad Amgylcheddol, yn y ffordd arferol, gyda dalfan sy'n esbonio bod atodiad cyfrinachol wedi cael ei gyflwyno i'r Arolygiaeth ac a allai fod ar gael ar gais.

3.19 Yr Amgylchedd Hanesyddol

Adroddiad Cwmpasu Rhan 3, Adran 8.1 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.19.1	Rhan 3, Tabl 8.4	Yr effaith ar yr asedau archaeolegol claddedig yn ystod y camau gweithredu a chynnal a chadw a datgomisiynu.	Mae'r Arolygiaeth yn cytuno bod effeithiau ffisegol uniongyrchol ar asedau archaeolegol claddedig yn ystod gweithredu, cynnal a chadw a datgomisiynu yn annhebygol, ac mae'n fodlon bod unrhyw effeithiau sy'n deillio o effeithiau uniongyrchol wedi'u cynnwys yn yr asesiad fel mater ar wahân. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
3.19.2	Rhan 3, Tabl 8.4	Yr effaith ar leoliad asedau hanesyddol uwchben y tir sy'n deillio o weithredu a chynnal a chadw'r asedau trosglwyddo ar y tir (ac eithrio'r is-orsaf ar y tir), gan gynnwys y ceblau allforio ar y tir a seilwaith cysylltiedig.	Mae'r Arolygiaeth yn cytuno bod effeithiau ffisegol uniongyrchol ar leoliad asedau hanesyddol uwchben y tir yn ystod gweithredu, cynnal a chadw a datgomisiynu yn annhebygol, ac mae'n fodlon bod unrhyw effeithiau sy'n deillio o effeithiau uniongyrchol wedi'u cynnwys yn yr asesiad fel mater ar wahân. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.19.3	dd/b	dd/b	Dim sylwadau.

3.20 Defnydd tir a hamdden

Adroddiad Cwmpasu Rhan 3, Adran 8.2 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.20.1	Rhan 3, Tabl 8.7	Aflonyddu ar dir amaethyddol a llai o fynediad iddo yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Ymgeisydd yn bwriadu hepgor effaith aflonyddu ar dir amaethyddol a llai o fynediad iddo yn ystod gweithredu ar y sail y byddai unrhyw effeithiau parhaol ar dir amaethyddol yn digwydd yn ystod y cam adeiladu ac y byddai effeithiau yn ystod y cam gweithredol yn gyfyngedig i weithgareddau cynnal a chadw ac atgyweirio a fyddai ar raddfa fach ac yn anfynych. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn ar y sail hon.
3.20.2	Rhan 3, Tabl 8.7	Aflonyddu ar adnoddau hamdden a llai o fynediad iddynt yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Ymgeisydd yn bwriadu hepgor effeithiau sy'n codi yn ystod y cam gweithredol ar y sail y bydd effeithiau'n gyfyngedig i weithgareddau cynnal a chadw ac atgyweirio a fyddai ar raddfa fach, ar sail tymor byr ac yn anfynych, ac felly mae effeithiau posibl yn annhebygol o fod yn arwyddocaol. Mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn ar y sail hon.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.20.3	dd/b	dd/b	Dim sylwadau.

3.21 Traffig a thrafnidiaeth

Adroddiad Cwmpasu Rhan 3, Adran 8.3 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.21.1	Rhan 3, Tabl 8.10	Effaith symudiadau cerbydau ychwanegol ar y Rhwydwaith Ffyrdd Lleol (LRN) a'r Rhwydwaith Ffyrdd Strategol (SRN) ar oedi i yrwyr a cherddwyr, gwahanu cymunedau, oedi i drafnidiaeth gyhoeddus a damweiniau a diogelwch yn ystod cam gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Adroddiad Cwmpasu yn datgan, yn ystod y cam gweithredol a chynnal a chadw, y bydd angen ymweld â'r asedau trosglwyddo ar y tir at ddibenion cynnal a chadw yn unig gan nad oes unrhyw gyfleusterau â staff a byddai'r cyfleusterau'n cael eu monitro o bell. Mae'r Arolygiaeth yn cytuno, ar y sail hon, bod effeithiau arwyddocaol cysylltiedig â thraffig gweithredu a chynnal a chadw yn annhebygol o ddigwydd ac y gellir hepgor asesu'r mater hwn o'r Datganiad Amgylcheddol. Dylai'r Datganiad Amgylcheddol ddisgrifio nifer a math tebygol y cerbydau sy'n ofynnol yn ystod pob cam o'r datblygiad i gefnogi'r casgliad hwn.
3.21.2	Rhan 3, Tabl 8.10	Effaith symudiadau cerbydau ychwanegol ar yr LRN a'r SRN ar oedi i yrwyr a cherddwyr, gwahanu cymunedau, oedi i drafnidiaeth gyhoeddus a damweiniau a diogelwch yn ystod cam datgomisiynu'r asedau trosglwyddo ar y tir.	Mae'r Adroddiad Cwmpasu yn disgwyl y bydd seilwaith/offer ar y tir nad oes ei angen mwyach yn cael ei adael yn ei le neu ei gludo ymaith o'r safle mewn swmp yn ystod y cam datgomisiynu. Felly, mae'r Adroddiad Cwmpasu yn rhagfynegi y bydd llai o symudiadau cerbydau ar yr LRN a'r SRN yn ystod y cam datgomisiynu o gymharu â'r cam adeiladu. Mae'r Arolygiaeth hefyd yn deall y bydd cynllun datgomisiynu yn cael ei baratoi ar ôl cydsynio (Rhan 1, paragraff 3.8.1.2). Mae'r Arolygiaeth yn fodlon y byddai'r asesiad o'r cam adeiladu yn cynrychioli achos gwaethaf, ac felly mae'n cytuno y gellir hepgor asesiad manwl o effeithiau traffig datgomisiynu o'r Datganiad Amgylcheddol. Fodd bynnag, dylai'r Datganiad Amgylcheddol esbonio'r dull a ddefnyddiwyd.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.21.3	Rhan 3, Tabl 8.9	Effaith Llwythi Anwahanadwy Anghyffredin (AILs) ar ddiogelwch defnyddwyr yr LRN, yr SRN a derbynyddion trafnidiaeth eraill yn ystod y camau gweithredu a chynnal a chadw a datgomisiynu.	Mae effaith AILs wedi cael ei heithrio o golofnau'r camau gweithredu, cynnal a chadw a datgomisiynu yn Rhan 3, Tabl 8.9. Fodd bynnag, nid yw wedi'i hamlygu fel 'effaith wedi'i hepgor' yn Rhan 3, Tabl 8.10. O ystyried natur y gwaith gweithredu a chynnal a chadw, mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn. Mae'r Arolygiaeth hefyd yn fodlon y byddai'r asesiad o'r cam adeiladu yn cynrychioli achos gwaethaf, ac felly mae o'r farn y gellir hepgor asesiad manwl o effeithiau traffig datgomisiynu o'r Datganiad Amgylcheddol. Fodd bynnag, dylai'r Datganiad Amgylcheddol esbonio'r dull a ddefnyddiwyd.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.21.4	Rhan 3, Tabl 8.9	Hawliau tramwy cyhoeddus (PRoW).	Dylai'r Datganiad Amgylcheddol gadarnhau p'un a fyddai angen gwyro neu gau PRoW yn barhaol yn ystod y cam gweithredol. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o effaith unrhyw wyriadau neu gau parhaol ar ddefnyddwyr PRoW, gan gynnwys cerddwyr, beicwyr a marchogion, lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

3.22 Sŵn a dirgryniad

Adroddiad Cwmpasu Rhan 3, Adran 8.4 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.22.1	Rhan 3, Tabl 8.12	Yr effaith ar dderbynyddion dynol ac asedau hanesyddol yn deillio o ddirgryniad a gynhyrchir gan symudiadau cerbydau ychwanegol ar y rhwydwaith priffyrdd lleol yn ystod adeiladu a datgomisiynu'r asedau trosglwyddo ar y tir.	Nid yw llwybrau cerbydau'n hysbys eto ac felly ni wyddys y pellter i unrhyw dderbynnydd dynol neu ased hanesyddol. Yn ogystal, nid yw nifer a math y cerbydau wedi cael eu pennu. Am y rhesymau hyn, ni all yr Arolygiaeth gytuno i hepgor effeithiau dirgryniad traffig adeiladu ar yr adeg hon. Am y rhesymau a ddisgrifir yn Rhif Adnabod 3.21.2 uchod, os gall y Datganiad Amgylcheddol ddangos y bydd effeithiau yn ystod y cam datgomisiynu yr un fath neu'n llai na'r rhai hynny yn ystod y cam adeiladu, gall yr Arolygiaeth gytuno i hepgor asesiad manwl ar gyfer y cam datgomisiynu.
3.22.2	Rhan 3, Tabl 8.12	Yr effaith ar dderbynyddion dynol ac asedau hanesyddol yn deillio o ddirgryniad a gynhyrchir yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Arolygiaeth yn fodlon bod dirgryniad o weithredu a chynnal a chadw'r cebl allforio ar y tir a'r ceblau cysylltu â'r grid yn annhebygol o arwain at effeithiau arwyddocaol, ac mae'n cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol. O ran yr is-orsaf ar y tir, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y mater hwn gan nad yw lleoliad yr is-orsaf wedi'i benderfynu eto ac ni wyddys y pellter i unrhyw dderbynnydd dynol neu ased hanesyddol. Nid yw'r Adroddiad Cwmpasu yn rhoi digon o wybodaeth am y lefelau dirgryniad disgwyliedig o'r is-orsaf. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu wybodaeth sy'n dangos cytundeb â rhanddeiliaid perthnasol ac absenoldeb effeithiau arwyddocaol tebygol.

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.22.3	Rhan 3, Tabl 8.12	Effaith sŵn a dirgryniad a gynhyrchir yn ystod gweithredu a chynnal a chadw'r cebl allforio ar y tir.	Ar sail y gwaith gweithredu a chynnal a chadw cyfyngedig sy'n ofynnol, mae'r Arolygiaeth yn fodlon bod effeithiau sŵn a dirgryniad arwyddocaol yn annhebygol o ddigwydd ac y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
3.22.4	Rhan 3, paragraffau 8.4.2.1 i 8.4.2.4	Ardal astudio ar gyfer derbynyddion sy'n sensitif i sŵn a dirgryniad.	Mae'r Adroddiad Cwmpasu yn cynnig ardal astudio sy'n canolbwyntio ar ble mae effeithiau posibl ar dderbynyddion sy'n sensitif i sŵn yn debygol o ddigwydd ac sy'n wahanol ar gyfer elfennau gwahanol o'r prosiect (h.y. aráe, ceblau ac is-orsaf ar y tir). Cynigir ardal astudio 50km i amlygu derbynyddion sy'n sensitif i sŵn wedi'u lleoli tua'r tir o Benllanw Cymedrig y Gorllanw (MHWS) y gallai gosod seilbyst ar gyfer yr asedau cynhyrchu alltraeth effeithio arnynt; dylid cyfiawnhau'r ardal hon ar sail canlyniadau'r gwaith modelu sŵn.
3.22.5	dd/b	Cerbydau ac offer adeiladu.	Dylid darparu gwybodaeth yn y Datganiad Amgylcheddol am y mathau o gerbydau a pheiriannau sydd i'w defnyddio yn ystod y cam adeiladu. Lle y ceir ansicrwydd ynglŷn â'r cerbydau a'r offer tebygol sydd i'w defnyddio, dylai'r asesiad ddefnyddio 'achos gwaethaf' ar gyfer derbynyddion, h.y. o fewn ffin y cais bod y cerbydau a'r peiriannau ar y pwynt agosaf posibl i dderbynnydd.
3.22.6	dd/b	Derbynyddion ecolegol sensitif.	Prin yw'r cyfeiriadau yn yr Adroddiad Cwmpasu at effeithiau sŵn a dirgryniad ar dderbynyddion ecolegol daearol. Mae'r

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Arolygiaeth o'r farn y dylai effeithiau o'r fath gael eu hystyried yn rhan o'r Datganiad Amgylcheddol ar gyfer pob cam, lle y bo'n berthnasol. Dylid croesgyfeirio'n briodol rhwng y bennod ar sŵn a dirgryniad a'r penodau perthnasol ar fioamrywiaeth.

3.23 Ansawdd aer

Adroddiad Cwmpasu Rhan 3, Adran 8.5 (Asedau Trosglwyddo)

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
3.23.1	Rhan 3, Tabl 8.17	Yr effaith ar dderbynyddion dynol ac ecolegol (baeddu gan lwch ac iechyd dynol) sy'n deillio o allyriadau llwch ffo a gynhyrchir yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Arolygiaeth yn cytuno bod y gweithgareddau sy'n gysylltiedig â gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir yn annhebygol o gynhyrchu symiau mawr o lwch, ac felly ei bod yn annhebygol y bydd unrhyw effaith arwyddocaol debygol yn codi mewn perthynas â phobl a derbynyddion ecolegol. Fel y cyfryw, gellir hepgor hyn o'r Datganiad Amgylcheddol.
3.23.2	Rhan 3, Tabl 8.17	Yr effaith ar dderbynyddion dynol ac ecolegol sy'n deillio o allyriadau aer a gynhyrchir gan draffig cerbydau yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Mae'r Arolygiaeth yn cytuno ei bod yn annhebygol y byddai newid sylweddol i lifoedd cerbydau yn ystod gweithredu a chynnal a chadw, ac felly ei bod hefyd yn annhebygol y byddai effeithiau arwyddocaol yn digwydd o ran ansawdd aer. Fodd bynnag, dylai'r Datganiad Amgylcheddol gadarnhau bod y symudiadau cerbydau ffordd disgwyliedig islaw gwerthoedd sgrinio'r Sefydliad Rheoli Ansawdd Aer (IAQM) a Diogelu Amgylcheddol y Deyrnas Unedig (EPUK), ac os eir yn fwy na'r

Rhif Adnabod	Cyf	Materion y cynigir eu hepgor gan yr Ymgeisydd	Sylwadau'r Arolygiaeth
			gwerthoedd dylid darparu asesiad o effeithiau arwyddocaol tebygol.
3.23.3	Rhan 3, Tabl 8.17	Yr effaith ar dderbynyddion dynol ac ecolegol sy'n deillio o allyriadau aer a gynhyrchir gan weithfeydd neu staciau yn ystod gweithredu a chynnal a chadw'r asedau trosglwyddo ar y tir.	Nid yw'r Datblygiad Arfaethedig yn cynnwys cynigion ar gyfer adeiladu gweithfeydd neu staciau, ac felly mae allyriadau aer sy'n deillio o'r elfennau hyn yn annhebygol o godi yn ystod y cam gweithredol a chynnal a chadw. Am y rheswm hwn, mae'r Arolygiaeth yn cytuno y gellir hepgor hyn o'r Datganiad Amgylcheddol.

4. ATODIADAU'R ADRODDIAD CWMPASU

4.1 Sgrinio Trawsffiniol, sgrinio'r Gyfarwyddeb Fframwaith Dŵr a sgrinio Parth Cadwraeth Morol

(Adroddiad Cwmpasu Rhan 4)

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
4.1.1	Rhan 4, Atodiad A	Sgrinio effeithiau trawsffiniol.	Mae'r Ymgeisydd yn bwriadu hepgor asesiad o effeithiau trawsffiniol ar gyfer y penodau ar yr agweddau canlynol: • alltraeth: – prosesau ffisegol; – ecoleg fenthig islanw a rhynglanw; – archaeoleg forol; – defnyddwyr eraill y môr; • ar y tir – daeareg ac amodau tir; – hydroleg a pherygl llifogydd; – ecoleg ddaearol ac adar rhynglanw; – yr amgylchedd hanesyddol; – defnydd tir a hamdden; – traffig a thrafnidiaeth; – sŵn a dirgryniad; – ansawdd aer;

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			• alltraeth ac ar y tir wedi'u cyfuno – morlun, tirwedd ac adnoddau gweledol – materion economaidd-gymdeithasol a chymunedol; – hedfanaeth a radar Mae'r Arolygiaeth yn cytuno bod effeithiau trawsffiniol arwyddocaol ar yr agweddau uchod yn annhebygol ac y gellir eu hepgor o'r Datganiad Amgylcheddol, heblaw am y canlynol: • 'Defnyddwyr eraill y môr' – ni ddarparwyd llawer o dystiolaeth a dim dadansoddiad wedi'i feintioli i ddangos y byddai 'lefelau is o hwylio a rasio alltraeth' rhwng y Deyrnas Unedig ac Iwerddon; felly dylai'r mater hwn gael ei gynnwys. • 'Ecoleg ddaearol ac adar rhynglanw' – mae'r Adroddiad Cwmpasu yn honni *"o ganlyniad i'r pellter mawr rhwng Ardal Chwilio Seilwaith Trosglwyddo Ar y Tir Mona a safleoedd Natura 2000 sydd wedi'u lleoli y tu allan i'r Deyrnas Unedig, ni ystyrir ei bod yn debygol y byddai adar mudol sy'n uniongyrchol gysylltiedig â safleoedd Natura 2000 mewn gwladwriaethau eraill yn cael eu haflonyddu nac yn dioddef yn sgil colli cyfleoedd i chwilota am fwyd neu orffwys mewn unrhyw ffordd a fyddai'n arwain at effeithiau arwyddocaol tebygol ar y safleoedd Natura 2000 hynny"* (Rhan 4, Atodiad A, paragraff 1.4.3.5). Mae'r Arolygiaeth o'r farn bod tystiolaeth annigonol i ragfynegi na fydd effeithiau trawsffiniol arwyddocaol yn codi ac nid yw'n cytuno y gellir hepgor y mater hwn o'r asesiad ar yr adeg hon.

Rhif Adnabod	Cyf	Disgrifiad	Sylwadau'r Arolygiaeth
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu wybodaeth sy'n dangos absenoldeb effaith arwyddocaol debygol. Bydd yr Arolygiaeth yn cynnal ymarfer sgrinio trawsffiniol cychwynnol ar ran yr Ysgrifennydd Gwladol o dan Reoliad 32 y Rheoliadau AEA, ar ôl i'r Farn Gwmpasu gael ei mabwysiadu.
4.1.2	Rhan 4, Atodiad B,	Sgrinio'r Gyfarwyddeb Fframwaith Dŵr (WFD).	Nid oes gan yr Arolygiaeth unrhyw sylwadau ar gwmpas arfaethedig asesiad sgrinio'r WFD, ond mae'n nodi bod cyngor gan CNC wedi'i ddarparu yn Atodiad 2 y Farn hon.
4.1.3	Rhan 4, Atodiad C	Sgrinio Parthau Cadwraeth Morol (MCZ).	Nid oes gan yr Arolygiaeth unrhyw sylwadau ar gwmpas arfaethedig yr asesiad sgrinio MCZ.

5. ATODIAD 1: CYRFF YMGYNGHORI YR YMGYNGHORWYD Â NHW'N FFURFIOL

TABL A1:CYRFF YMGYNGHORI RHAGNODEDIG[1]

DISGRIFIAD ATODLEN 1	SEFYDLIAD
Gweinidogion Cymru	Llywodraeth Cymru
Yr Awdurdod Gweithredol Iechyd a Diogelwch	Yr Awdurdod Gweithredol Iechyd a Diogelwch
Natural England	Natural England
Comisiwn Adeiladau Hanesyddol a Henebion Lloegr	Historic England
Yr awdurdod tân ac achub perthnasol	Gwasanaeth Tân ac Achub Gogledd Cymru
Y comisiynydd heddlu a throseddu perthnasol	Comisiynydd Heddlu a Throseddu Gogledd Cymru
Y cyngor/cynghorau plwyf perthnasol neu, pan fo'r cais yn berthnasol i dir yng Nghymru neu'r Alban, y cyngor cymuned perthnasol	Cyngor Cymuned Betws-yn-Rhos
	Cyngor Cymuned Llanfairtalhaiarn
	Cyngor Cymuned Llanefydd
	Cyngor Tref Abergele
	Cyngor Cymuned Llysfaen
	Cyngor Cymuned Llanddulas a Rhyd-y-Foel
	Cyngor Tref Towyn a Bae Cinmel
	Cymuned Prestatyn
	Cymuned Cefn Meiriadog
	Cyngor Tref Bodelwyddan
	Cymuned y Rhyl

[1] Atodlen 1 Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithrefn Ragnodedig) 2009 ('y Rheoliadau APFP')

DISGRIFIAD ATODLEN 1	SEFYDLIAD
	Cyngor Cymuned Tremeirchion, Cwm a'r Waun
	Cyngor Dinas Llanelwy
	Cyngor Tref Rhuddlan
	Cymuned Dyserth
Comisiwn Cydraddoldeb a Hawliau Dynol	Comisiwn Cydraddoldeb a Hawliau Dynol
Comisiwn Brenhinol Henebion Cymru	Comisiwn Brenhinol Henebion Cymru
Y Corff Adnoddau Naturiol ar gyfer Cymru	Cyfoeth Naturiol Cymru
Y Cyd-bwyllgor Cadwraeth Natur	Y Cyd-bwyllgor Cadwraeth Natur
Asiantaeth y Môr a Gwylwyr y Glannau	Asiantaeth y Môr a Gwylwyr y Glannau
Asiantaeth y Môr a Gwylwyr y Glannau – Swyddfa Ranbarthol	Asiantaeth y Môr a Gwylwyr y Glannau – Canolfan Cydlynu Achub Morwrol Caergybi
Y Sefydliad Rheoli Morol	Y Sefydliad Rheoli Morol (MMO)
Asiantaeth Diogelu Pysgodfeydd yr Alban	Cadwraeth Forol yr Alban
Yr Awdurdod Hedfan Sifil	Yr Awdurdod Hedfan Sifil
Yr Awdurdod Priffyrdd Perthnasol	Cyngor Bwrdeistref Sirol Conwy
	Cyngor Sir Ddinbych
Y Cyngor Teithwyr	Transport Focus
Y Pwyllgor Cynghori ar Drafnidiaeth Pobl Anabl	Y Pwyllgor Cynghori ar Drafnidiaeth Pobl Anabl
Yr Awdurdod Glo	Yr Awdurdod Glo
Y Swyddfa Rheilffyrdd a Ffyrdd	Y Swyddfa Rheilffyrdd a Ffyrdd
Gweithredwr Cymeradwy	Network Rail Infrastructure Ltd
	Network Rail (High Speed) Ltd
Yr Awdurdod Marchnadoedd Nwy a Thrydan	OFGEM

DISGRIFIAD ATODLEN 1	SEFYDLIAD
Yr Awdurdod Rheoleiddio Gwasanaethau Dŵr	Ofwat
Yr awdurdod rheoleiddio gwastraff perthnasol	Cyfoeth Naturiol Cymru
Y bwrdd draenio mewnol perthnasol	Afon Ganol (Dwyrain a Gorllewin)
Tŷ'r Drindod	Tŷ'r Drindod
Asiantaeth Diogelwch Iechyd y Deyrnas Unedig, un o asiantaethau gweithredol yr Adran Iechyd a Gofal Cymdeithasol	Asiantaeth Diogelwch Iechyd y Deyrnas Unedig
Y fforwm cydnerthedd lleol perthnasol	Ysgrifenyddiaeth Fforwm Cydnerthedd Gogledd Cymru
Comisiynwyr Ystad y Goron	Ystad y Goron
Y Corff Adnoddau Naturiol ar gyfer Cymru	Cyfoeth Naturiol Cymru
Y bwrdd iechyd lleol perthnasol	Bwrdd Iechyd Prifysgol Betsi Cadwaladr
Ymddiriedolaethau'r Gwasanaeth Iechyd Gwladol	Tîm Diogelu Iechyd Iechyd Cyhoeddus Cymru
	Ymddiriedolaeth Gwasanaethau Ambiwlans Cymru
	Ymddiriedolaeth GIG Felindre
Yr Ysgrifennydd Gwladol dros Amddiffyn	Y Weinyddiaeth Amddiffyn

TABL A2:YMGYMERWYR STATUDOL PERTHNASOL[2]

YMGYMERWR STATUDOL	SEFYDLIAD
Yr Ymddiriedolaeth GIG berthnasol	Tîm Diogelu Iechyd Iechyd Cyhoeddus Cymru
	Ymddiriedolaeth Gwasanaethau Ambiwlans Cymru

[2] Mae gan y diffiniad o 'Ymgymerwr Statudol' yn y Rheoliadau APFP yr un ystyr ag yn Adran 127 Deddf Cynllunio 2008

YMGYMERWR STATUDOL	SEFYDLIAD
	Ymddiriedolaeth GIG Felindre
Y bwrdd iechyd lleol perthnasol	Bwrdd Iechyd Prifysgol Betsi Cadwaladr
Rheilffyrdd	Network Rail Infrastructure Ltd
	Ystad Rheilffyrdd Hanesyddol Highways England
Yr awdurdod dociau a harbyrau	Y Rhyl (Harbwr Foryd)
	Harbwr Conwy
Yr Awdurdod Hedfan Sifil	Yr Awdurdod Hedfan Sifil
Deiliad Trwydded (Pennod 1 Rhan 1 Deddf Trafnidiaeth 2000)	NATS En-Route Safeguarding
Darparwr Gwasanaeth Cyffredinol	Grŵp y Post Brenhinol
Yr Asiantaeth yr Amgylchedd berthnasol	Cyfoeth Naturiol Cymru
Yr ymgymerwr dŵr a charthffosiaeth perthnasol	Hafren Dyfrdwy Limited
	Dŵr Cymru
Y cludwr nwy cyhoeddus perthnasol	Cadent Gas Limited
	Last Mile Gas Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited

YMGYMERWR STATUDOL	SEFYDLIAD
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
Y cynhyrchwr trydan perthnasol sydd â Phwerau Gorchymyn Prynu Gorfodol (CPO)	Fferm Wynt Alltraeth Gwynt y Môr
	Estyniad Burbo Bank
	Awel y Môr Offshore Wind Farm Limited
Y dosbarthwr trydan perthnasol sydd â Phwerau CPO	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Forbury Assets Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited

YMGYMERWR STATUDOL	SEFYDLIAD
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	SP Distribution Plc
	SP Manweb Plc
Y trosglwyddydd trydan perthnasol sydd â Phwerau CPO	Diamond Transmission Partners BBE Limited
	Gwynt y Môr OFTO plc
	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

TABL A3: AWDURDODAU LLEOL ADRAN 43 (AT DDIBENION ADRAN 42(1)(B))[3]

AWDURDOD LLEOL[4]
Awdurdod Parc Cenedlaethol Eryri
Cyngor Sir Powys
Cyngor Sir y Fflint
Cyngor Bwrdeistref Sirol Wrecsam
Cyngor Gwynedd
Cyngor Bwrdeistref Sirol Conwy
Cyngor Sir Ddinbych

[3] Adrannau 43 a 42(B) Deddf Cynllunio 2008

[4] Fel y'i diffinnir yn Adran 43(3) Deddf Cynllunio 2008

TABL A4:CYRFF YMGYNGHORI NAD YDYNT YN RHAGNODEDIG

SEFYDLIAD
Comisiynydd y Gymraeg
Trafnidiaeth Canolbarth Cymru (TraCC)
Llywodraeth Ynys Manaw
Sefydliad Cenedlaethol Brenhinol y Badau Achub
Cadw
Cyngor Sir Ynys Môn
Cyngor Gorllewin Swydd Gaerlleon a Chaerllion
Cyngor Dinas Lerpwl
Cyngor Bwrdeistref Gorllewin Swydd Gaerhirfryn
Cyngor Bwrdeistref Fylde
Cyngor Sir Swydd Gaerhirfryn
Cyngor Sefton
Cyngor Bwrdeistref Metropolitan Cilgwri

6. ATODIAD 2: YMATEBWYR I'R YMGYNGHORIAD A CHOPÏAU O YMATEBION

CYRFF YMGYNGHORI A YMATEBODD ERBYN Y TERFYN AMSER STATUDOL:
Cadw
Cyngor Bwrdeistref Sirol Conwy
Cyngor Sir Ddinbych
Dŵr Cymru
Cyngor Bwrdeistref Fylde
Hafren Dyfrdwy Limited
Yr Awdurdod Gweithredol Iechyd a Diogelwch
Historic England
Llywodraeth Ynys Manaw (Pwyllgor Moroedd Tiriogaethol)
Y Cyd-bwyllgor Cadwraeth Natur
Cyngor Sir Swydd Gaerhirfryn
Asiantaeth y Môr a Gwylwyr y Glannau
National Grid Electricity Transmission Plc
NATS (En-Route) Plc
Natural England
Cyfoeth Naturiol Cymru
Network Rail
Cyngor Sir Powys
Iechyd Cyhoeddus Cymru
Comisiwn Brenhinol Henebion Cymru
SP Energy Networks
Yr Awdurdod Glo
Cyngor Tref Towyn a Bae Cinmel

Tŷ'r Drindod
Asiantaeth Diogelwch Iechyd y Deyrnas Unedig

The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Mona Offshore Wind Project

Case Reference: EN010137

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

15 June 2022

TABLE OF CONTENTS

1. INTRODUCTION

1.0.1 On 05 May 2022, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Mona Offshore Wind Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Mona Offshore Wind Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

http://infrastructure.planninginspectorate.gov.uk/document/EN010137-000011

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Part 1 Section 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Part 1, Section 3.3	Project Design Envelope (PDE) approach.	Part 1 paragraph 3.1.1.2 refers to 'Realistic worst case scenarios'. It is not clear how these relate to the maximum design scenario described in Part 1 section 3.3. A 'realistic design scenario' has also been referred to in the underwater noise chapter (Part 2 paragraph 3.2.7.4 and Part 3, paragraph 3.2.7.4). The ES should assess the worst case that could potentially be built out in accordance with the Authorised Development of the Development Consent Order (DCO) being applied for; this includes (but is not limited to) parameters relating to the number of turbines, turbine height, foundation types, scour protection, cable protection and the layout of offshore structures.
2.1.2	Part 1, paragraph 3.4.3.6	Drilling disposal site.	The ES should identify the likely site for disposal of drill arisings and include an assessment of effects from these activities.
2.1.3	Part 1, Section 3.4.4	Seabed preparation.	The ES should provide further detail on the proposed seabed preparation activities required and identify the worst-case footprint of seabed disturbance that would arise. Should seabed preparation involve dredging, the ES should identify the quantities of dredged material and likely location for disposal. Any likely significant effects from dredging should be assessed. The Inspectorate understands that the number, type and size of unexploded ordnance (UXO) devices is not known at this stage and that a dedicated UXO survey will be conducted prior to construction

ID	Ref	Description	Inspectorate's comments
			works. The ES should therefore explain the informed assumptions applied to establish the maximum design envelope.
2.1.4	Part 1, Tables 3.3 to 3.7 and Section 3.4.5	Scour protection.	The Scoping Report has detailed the maximum seabed footprints for different foundation types without scour protection. Paragraph 3.4.5.3 states that the amount of scour protection will vary for different foundation types. The ES should confirm the amount of scour protection required for each foundation type under consideration, what the maximum seabed footprints would be and the timeframes for installation.
2.1.5	Part, 1 Section 3.4.7	Cable protection.	Part 2, Section 5.1.6 and Part 3, Section 5.1.6 state that there will be a target depth of 1m for cable protection. The ES should explain why burial depths may not be achievable for the length of the cable. It should detail the maximum volume of material required for cable protection and explain how this has been quantified.
2.1.6	Part 1, paragraphs 3.5.2.4 & 3.5.3.4	Cable installation.	As the landfall and onshore components are still subject to areas of search, it is not yet clear whether any temporary or permanent crossings of watercourses, major roads and / or railways would be required. The ES should identify the locations and types of all such crossings. Where reliance is placed on the use of a specific method to mitigate significant effects, the Applicant should ensure that such commitments are appropriately defined and secured.
2.1.7	Part 1, Section 3.5.4	Onshore substation.	The Scoping Report states that two substation options are included in the design envelope: Air Insulated Switchgear (AIS) where the equipment is housed in an open yard and Gas Insulated Switchgear (GIS) where the equipment is housed within single or multiple buildings. It is also possible to have a combination of both. It is not clear whether these options are to remain for the DCO application.

ID	Ref	Description	Inspectorate's comments
			Part 1, Table 3.13 sets out the design envelope for the onshore substation. This identifies up to four buildings and provides dimensions of a 'main building'. Dimensions of the other buildings have not been provided. The ES should clearly set out the worst-case parameters for assessment, in particular in relation to landscape and visual impacts.
2.1.8	Part 1, paragraphs 3.6.1 & 3.7.1.3	Construction port location & operations and maintenance (O&M) base.	The Applicant should make effort to identify the location of the port and O&M base, where possible, and assess any likely significant effects associated. In the event that the locations have not been confirmed, the ES should make effort to assess the likely significant effects associated with relevant assumptions and a worst-case scenario.
2.1.9	Part 3, paragraph 8.1.6.1	Offshore lighting.	The Scoping Report indicates in numerous instances that lighting of the offshore elements would be required for navigation purposes. The ES should detail any temporary or permanent lighting requirements and ensure that any likely significant effects from their presence are assessed within the ES; with particular consideration given to ecological, landscape and visual and navigational receptors.
2.1.10	n/a	Project description.	The Scoping Report does not describe any additional equipment often associated with offshore wind farms, such as meteorological masts and buoys. The Applicant should ensure the project description within the ES and assessment encompasses all project elements.
2.1.11	Part 1, Section 3.7	Operation and maintenance.	The ES should provide a full description of the nature and scope of operation and maintenance activities, including types of activity, frequency, and how works will be carried out for both offshore and onshore components. This should include consideration of potential overlapping of activities with those required for the continuing

ID	Ref	Description	Inspectorate's comments
			operation of existing windfarms in the area and construction of those proposed.
2.1.12	Part 3, Table 6.8 and Part 4, Annex B, paragraph 2.1.2.3	Stockpiling.	Stockpiling of excavated material is identified in the hydrology and flood risk chapter and Water Framework Directive screening, however stockpiling is not mentioned within the Project Description or the Geology, hydrogeology and ground conditions sections. The ES should confirm the quantities of material to be stockpiled and be consistent in its reporting.
2.1.13	n/a	Employment.	The ES should detail the number of anticipated full and part time jobs generated by all phases of the Proposed Development.
2.1.14	n/a	Vessel movements.	In addition to details on vehicle movements which the Scoping Report has proposed to include in the ES (Part 3, Table 8.9), the ES should detail the type, number and frequency of vessel movements required to construct and operate the Proposed Development.
2.1.15	n/a	Relationship to other offshore wind farms.	The Proposed Development is located in the Irish Sea with both built and proposed offshore wind farms close by. The Inspectorate considers that it would be useful to include a figure in the introductory section of the ES which places the Proposed Development in the context of the surrounding offshore wind farms.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Part 1 Section 4)

ID	Ref	Description	Inspectorate's comments
2.2.1	Part 1, Section 1.4.1	Purpose of the ES.	The Scoping Report states that as well as being prepared to support a request for a Scoping Opinion from the Secretary of State, it will also support scoping with Natural Resources Wales (NRW) in relation to a marine licence (ML) application. The Applicant is reminded that a DCO examination can only examine matters pertaining to the DCO application. It should therefore ensure that the ES clearly identifies matters relevant to each separate application and that the methods of securing mitigation through either Requirements in the DCO or Conditions in the ML are clearly identified.
2.2.2	Part 1, Section 4.4.1	Study areas.	The Applicant should seek to agree study areas and receptors with relevant consultation bodies. The ES should confirm whether the study area proposed aligns with relevant policy and guidance and provide justification for any divergences. The ES should include figures to identify the final study area for each aspect and the location of any static receptors considered in the assessment. The generation assets study areas for Benthic, subtidal and intertidal ecology and Fish and shellfish ecology include a straight-line boundary on the western edge which appears arbitrary from an effects perspective. The study areas should sufficiently encompass the full extent of any receptors likely to be significantly affected.
2.2.3	Part 1, paragraph 4.4.3	Evidence based approach.	The Inspectorate acknowledges that data and knowledge regarding the baseline environment exists from surveys, assessments and post-construction monitoring for other proposed and existing offshore wind projects.

ID	Ref	Description	Inspectorate's comments
			The Inspectorate understands the benefits of utilising this information to supplement site specific survey data but advises that suitable care should be taken to ensure that the information in the ES remains representative and fit for purpose. This should include taking into account the impact of more recent developments that have occurred subsequent to when the data was collected. Similarly, where data from other wind farms is used to support the assessment, the ES should confirm that these are truly comparable, for example in terms of the size of foundations/turbines. The Applicant should make effort to agree the suitability of information used for the assessments in the ES with relevant consultation bodies (e.g. NRW).
2.2.4	Part 1, Section 4.5	Magnitude of impact and receptor sensitivity.	Where possible, the Applicant should seek to agree the magnitude of impact or sensitivity of receptors with relevant consultees through the PEIR and pre-application process. Where differences in opinion remain, these should be identified within the ES with justification given for the Applicant's choice.
2.2.5	Part 1, paragraph 4.5.1.1	Reversibility of impact.	The ES should define what a 'reasonable timescale' or 'short time period' would be within which recovery could occur so that an impact would be reversible/not permanent.
2.2.6	Part 1, Section 4.8	Cumulative effects.	The Applicant should note that the types of major developments listed in Planning Inspectorate Advice note Seventeen: Cumulative Effects Assessment Relevant to Nationally Significant Infrastructure Projects are applicable to the onshore environment as well as the offshore environment. In light of the number of ongoing developments within the vicinity of the Proposed Development application site, the ES should clearly state which developments will be assumed to be part of the baseline

ID	Ref	Description	Inspectorate's comments
			and those which are to be considered in the cumulative effects assessment. A number of respondents to the Scoping Report (including Natural England (NE), Denbighshire County Council and the Isle of Man Government) have identified proposed developments in the vicinity of the Proposed Development, or have provided advice on the types of projects, plans or activities that should be included (see Appendix 2 of this Opinion); these should be taken into account in the cumulative effects assessment. The Applicant should seek to agree the scope of the projects assessed with these consultation bodies.
2.2.7	n/a	Mitigation.	A number of mitigation plans have been referred to in aspect chapters. Where plans are relied upon to avoid significant environmental effects, outline or in-principle plans should be submitted as part of the DCO application.
2.2.8	n/a	Management plans.	The Scoping Report refers to both an Environmental Management Plan and an Ecological Management Plan and uses the abbreviation EMP for both. To avoid confusion, the Applicant should provide distinct names and abbreviations for its proposed management plans.
2.2.9	n/a	Marine water quality.	The ES should identify any likely significant effects on marine water quality from the releases of drilling mud used at the landfall and from the release of bacteria and its enhanced survival due to elevated suspended sediment concentrations (SSC). Subsequent effects on Bathing Waters and benthic and intertidal ecology should be assessed, where significant effects are likely to occur.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Physical Processes

Scoping Report Part 2, Section 3.1 (Generation Assets) and Part 3, Section 3.1 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Part 2, Table 3.3 and Part 3, Table 3.4	Changes to bathymetry due to depressions left by jack-up vessels. (Generation assets and transmission assets)	The Scoping Report states that monitoring at Barrow offshore wind farm has shown depressions to be infilled 12 months after construction. The Inspectorate agrees that any changes to bathymetry due to depressions left by jack-up vessels would likely be temporary and unlikely to result in significant effects. This matter can therefore be scoped out of the ES. The Scoping Report also proposes to scope out impacts from jack-up vessel spud-cans and jack-up vessel footprints on the sedimentary regime. No explicit justification for this conclusion has been provided in the Scoping Report and there is no evidence that additional scour from the depressions would not give rise to significant effects. The Inspectorate therefore does not agree this matter can be scoped out. See ID 3.1.2 below regarding secondary scour.
3.1.2	Part 2, Table 3.3 and Part 3, Table 3.4	Scour of seabed sediments during the operation and maintenance phase. (Generation assets and transmission assets)	The Inspectorate notes that scour protection would be installed, however has considered the responses from NRW and NE (see Appendix 2 of this Opinion) on this matter and concludes that secondary scour impacts should be scoped into the assessment. No information has been provided regarding the timeframes for installing scour protection. The ES should also provide details regarding timeframes for installing scour protection and either provide assurances that the timeframes for installing scour protection would be sufficient to ensure there would be no likely significant

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			effects or provide an assessment of effects prior to the installation of scour protection, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.1.3	Part 2, Section 3.1.2	Study area. (Generation assets)	Part 2, Table 3.2 states that foundations and associated scour protection within the array area could disrupt temperature and salinity stratification and their seasonal variation in the Dee Estuary and that this impact has been specifically highlighted in the Evidence Plan process. The Inspectorate notes that the Dee Estuary is outside of the proposed study area shown on Part 2 Figure 3.2. Therefore, the Applicant should provide further justification for the proposed study area and ensure that all receptors likely to be affected are identified.
3.1.4	Part 2, Table 3.2 and Part 3, Table 3.3	Impacts from seabed levelling. (Generation assets and transmission assets)	Part 1, paragraph 3.4.4.1 states that seabed levelling may be required. The ES should assess any likely significant secondary effects that this may have on changes to the current/flow regime, wave regime and sediment transport regime and any morphological changes. Impacts from dredging and disposal of material should also be assessed, where significant effects are likely to occur.

3.2 Underwater noise

Scoping Report Part 2, Section 3.2 (Generation Assets) and Part 3, Section 3.2 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Part 2, Table 3.6 and Part 3, Table 3.7	Effects of the particle motion elements of underwater noise on marine mammals during all phases. (Generation assets and transmission assets)	The Scoping Report states that there is insufficient evidence that particle motion has any effect on marine mammals. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.

ID	Ref	Description	Inspectorate's comments
3.2.2	Part 2, Section 3.2.1 and Part 3, Section 3.2.1	Inter relationships with Commercial Fisheries. (Generation assets and transmission assets)	The Scoping Report states that the underwater noise study would support the Commercial fisheries ES chapter. The relevant Scoping Report chapters (Part 2, Section 5.1 and Part 3, Section 5.1) do not identify noise as a potential impact. The influence of noise impacts on commercial fisheries (i.e. as a result of impacts to targeted species) should be clearly explained and assessed within the ES.
3.2.3	Part 2, Table 3.5 and Part 3, Table 3.6	Effects of underwater noise on marine life due to jacket or monopile cutting and removal. (Generation assets and transmission assets)	Part 2, Table 3.5 and Part 3, Table 3.6 propose to assess the effects of underwater noise on marine life due to jacket or monopile cutting and removal during decommissioning. The Scoping Report does not propose to assess this potential impact within the Fish and shellfish ecology, Marine mammals or Offshore ornithology ES chapters. The

ID	Ref	Description	Inspectorate's comments
			outcomes of this assessment should be presented within the relevant chapters.
3.2.4	Part 2, Section 3.2.7 and Part 3, Section 3.2.7	Potential for injury and behavioural disturbance. (Generation assets and transmission assets)	The ES should describe the Permanent Threshold Shift (PTS), Temporary Threshold Shift (TTS) and disturbance ranges used for all species assessed, as well as the potential for the disturbance impact footprints to overlap with the boundary of offshore designated sites.
3.2.5	Part 2, Section 3.2.7 and Part 3, Section 3.2.7	Modelling for non-piling activities. (Generation assets and transmission assets)	Paragraph 3.2.7.4 implies that noise propagation modelling will be undertaken for piling operations only. However, paragraph 3.2.1.2 and Table 3.5 identify the potential for other activities to generate underwater noise and vibration. The Marine mammals aspect chapter also indicates that modelling will be undertaken for non-piling 'noisy' activities e.g. rock placement, vessel movement. The Scoping Report does not state whether cable laying activities (i.e. trenching, ploughing, jetting) would generate underwater noise and vibration. The ES should clearly identify all sources of underwater noise and vibration and assess the impacts from these activities where significant effects are likely to occur. The ES should set out the methodology and assumptions for all modelling undertaken.
3.2.6	Part 2, paragraph 3.2.7.4 and Part 3, paragraph 3.2.7.7	Concurrent piling. (Generation assets and transmission assets)	The ES should demonstrate that the worst-case scenario accounts for concurrent piling activities that are located as far apart from each other as would be possible in the design envelope, and thus result in the greatest potential extent of noise impacts.

3.3 Benthic subtidal and intertidal ecology

Scoping Report Part 2, Section 4.1 (Generation Assets) and Part 3, Section 4.1 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Part 2, Table 4.5 and Part 3, Table 4.6	Impacts to benthic invertebrates due to electromagnetic fields (EMF) (Generation assets and transmission assets)	The Inspectorate does not agree that impacts of electromagnetic fields (EMF) on benthic species can be scoped out, as insufficient evidence has been provided at this time to support this approach. The Scoping Report identifies a target burial depth of 1m (minimum 05m) but also references flexibility/uncertainty associated with the likely burial depth and includes for cable protection, should burial of the offshore cable not be achievable. The ES should assess effects on sensitive benthic ecology receptors from EMF, where significant effects are likely to occur. The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies including NRW.
3.3.2	Part 2, Table 4.5 and Part 3, Table 4.6	Accidental pollution during construction, operation and maintenance and decommissioning (Generation assets and transmission assets)	The Scoping Report proposes to scope out accidental pollution resulting from construction, operation and decommissioning of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environmental Management Plan and its constituent Marine Pollution Contingency Plan (MPCP). The ES should also explain how such measures will be secured.
3.3.3	Part 2, Table 4.5	Impacts from the release of sediment-bound contaminants (Generation assets)	The Scoping Report states that historical sampling within the vicinity of the Mona Potential Array Area has shown that levels of sediment contaminants are low, and that site-specific sediment chemistry sampling will be undertaken during subtidal sampling.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			At this stage and in the absence of the results of the further sampling, the Inspectorate does not agree to scope out this matter. The ES should include an assessment of the effects on benthic ecology from the release of sediment-bound contaminants, where likely significant effects could occur.
3.3.4	Part 2, Table 4.4 and Part 3, Table 4.5	Increased risk of introduction and spread of invasive non-native species (INNS) during operation (Generation assets and transmission assets)	The Inspectorate considers there is the potential risk of INNS introduction and spread during the operational phase as a result of vessels used for maintenance activities. The ES should include an assessment of the increased risk of introduction and spread of INNS during operation on benthic ecology receptors, where likely significant effects could occur.

ID	Ref	Description	Inspectorate's comments
3.3.5	Part 2, Paragraph 4.1.4.26	Baseline conditions and data sources (Generation assets)	The Scoping Report states that from initial analysis of data, the Mona Potential Array Area is unlikely to have more than a low resemblance to the habitat 'sea pen and burrowing megafauna communities'. There is a possible presence of two areas that show a low resemblance to a 'rocky reef' habitat. The Applicant's attention is directed to JNCC Report No 656: Refining the criteria for defining areas with a 'low resemblance' to Annex I stony reef', which may be useful for the determination of such habitat. The Applicant is also encouraged to discuss the findings of the preliminary 2021 survey results, particularly with regards to these habitat/community types, with NRW.
3.3.6	Part 3, Table 4.3	Designated sites (Transmission assets)	The ES should also consider potential effects on the benthic features of Creigiau Rhiwledyn/Little Ormes Head SSSI, which lies within the

ID	Ref	Description	Inspectorate's comments
			transmission assets study area, where likely significant effects could occur.
3.3.7	Part 2, Paragraphs 4.1.4.28 and 4.1.4.30, Table 4.2 and Table 4.3	Relevant protected benthic species and habitats which have the potential to occur within the Mona benthic subtidal and intertidal ecology study area (Generation assets)	The Applicant's attention is directed to the comments and data sources provided by the Isle of Man Government (see Appendix 2 of this Opinion) concerning protected sites, habitats and species in Manx waters located within the Mona benthic subtidal and intertidal ecology study area for the generation assets. The ES should include an assessment of effects on protected sites, habitats and species within Manx waters, where likely significant effects could occur.
3.3.8	Part 3, Table 4.4	Relevant protected benthic species and habitats which have the potential to occur within the Mona benthic subtidal and intertidal ecology study area (Transmission assets)	The ES should consider, as far as is reasonably possible, Annex I features outside Special Areas of Conservation (SACs) that may potentially occur within the Mona benthic subtidal and intertidal study area e.g. Constable Bank (Annex I Sandbank outside SAC), where likely significant effects could occur.
3.3.9	Part 3, Table 4.5	Potential impacts - temporary habitat loss/disturbance and long-term habitat loss. (Transmission assets)	It is unclear from the Scoping Report whether potential impacts from cable landing activities (e.g. trenchless methods) are included in the assessment of both temporary habitat loss/disturbance and long-term habitat loss for the transmission assets on benthic ecology. The ES should include an assessment of cable landing activities on benthic ecology, where likely significant effects could occur.
3.3.10	Part 2, Table 4.4 and Part 3, Table 4.5	Potential impacts - increased risk of introduction and spread of INNS from vessel movements – proposed approach to assessment.	The assessment of INNS for the transmission assets is proposed to be quantitative in nature; however, for the generation assets this is proposed to be a qualitative assessment. The proposed assessment of 'colonisation of hard structures' by INNS for both study areas is also proposed to be a qualitative assessment. It is unclear if the different approach is intentional.

ID	Ref	Description	Inspectorate's comments
		(Generation and transmission assets)	The ES should clearly describe the methodology applied to the assessment of INNS for the Proposed Development and clarify where different approaches are to be applied within aspects and study areas.
3.3.11	Part 2, Table 4.4 and Part 3, Table 4.5	Potential impacts – habitat alteration. (Generation assets and transmission assets)	Part 2, Table 4.4 does not identify 'habitat alteration' as a potential effect of the Proposed Development. The introduction of hard substrates may consequently result in new and different biological communities in a predominantly soft sediment environment. The ES should consider the potential effect of habitat alteration, where likely significant effects could occur.
3.3.12	Part 2, Table 4.4	Potential impacts – heat. (Transmission assets)	The Scoping Report has not addressed the potential effects of heat generation from the transmission assets on benthic subtidal and intertidal ecology. The Inspectorate considers that any likely significant effects from temperature effects from cabling should be scoped into the assessment, with potential effects considered for benthic ecology and bacterial growth.

3.4 Fish and shellfish ecology

Scoping Report Part 2, Section 4.2 (Generation Assets) and Part 3, Section 4.2 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Part 2, Table 4.11 and Part 3, Table 4.12	Accidental pollution during all phases. (Generation assets and transmission assets)	The Scoping Report proposes to scope out accidental pollution resulting from all phases of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environmental Management Plan and its constituent MPCP. The ES should also explain how such measures will be secured.
3.4.2	Part 2, Table 4.11	Underwater noise from wind turbine operation during operation and maintenance phase. (Generation assets)	The Inspectorate notes the references to literature and monitoring reports from other wind farms which conclude that any potential impact from operational wind turbines would be negligible. However, these are dated from 2011 and 2014 and turbine output and size has greatly increased since. In the absence of evidence that the proposed turbines would have comparable noise outputs, the Inspectorate does not agree this matter can be scoped out of the ES.
3.4.3	Part 2, Table 4.11	Impacts from the release of sediment-bound contaminants. (Generation assets)	The Scoping Report states that historical sampling within the vicinity of the Mona Potential Array Area has shown that levels of sediment contaminants are low, and that site-specific sediment chemistry sampling will be undertaken during subtidal sampling. At this stage and in the absence of the results of the further sampling, the Inspectorate does not agree to scope out this matter. The ES should include an assessment of the effects on fish and shellfish ecology from the release of sediment-bound contaminants, where likely significant effects could occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.4	Part 2, Table 4.11 and Part 3, Table 4.12	Underwater noise from vessels during all phases. (Generation assets and transmission assets)	Part 2, Table 4.11 and Part 3, Table 4.12 provide justification to scope out this matter in respect of the operational phase only, stating that noise is likely to be low and effects would only occur if fish species remained within the immediate vicinity of vessels (i.e. within metres) for a number of hours, which is highly unlikely. The Scoping Report has not provided any evidence to support this assertion and has not provided reasoning to scope out construction and decommissioning. Nevertheless, the Inspectorate considers that significant effects are unlikely and agrees that this matter can be scoped out.
3.4.5	Part 2, Table 4.10 and Part 3, Table 4.11	Underwater noise during operation. (Generation assets and transmission assets)	The Scoping Report does not propose to assess this matter during the operational phase. The Inspectorate notes that this contrasts with the proposal to assess disturbance to marine mammals for other noise-producing activities during operation. The Inspectorate considers that activities during maintenance work such as the use of jack-up barges have the potential to generate underwater noise and vibration. Accordingly, the ES should include an assessment of these matters or evidence demonstrating agreement with the relevant consultation bodies that significant effects are not likely to occur.

ID	Ref	Description	Inspectorate's comments
3.4.6	Part 2, Table 4.16 and Part 3, Table 4.7	Desktop data. (Generation assets and transmission assets)	No site-specific fish and shellfish surveys are proposed. Whilst the Inspectorate acknowledges the numerous data sources available, their relevance to the Proposed Development has not been clearly explained. The Scoping Report describes the results of surveys carried out for a number of offshore windfarms. However, none of these projects spatially overlap with the Proposed Development and a number of datasets proposed to be used to inform the baseline are

ID	Ref	Description	Inspectorate's comments
			more than 10 years old. The Applicant should ensure that the baseline data used in the ES assessments are sufficiently up to date to provide a robust baseline. If only existing data is to be used, the ES should provide evidence to justify that it constitutes a robust characterisation of the receiving environment, with reference to the date, seasonal period and geographic coverage of the data. Use of existing data should be done in agreement with consultees.
3.4.7	Part 2, Table 4.9 and Part 3, Table 4.10	Protected species. (Generation assets and transmission assets)	Part 2, Table 4.9 and Part 3, Table 4.10 identify fish and shellfish species as habitats of principal importance in England under the NERC Act 2006. The Applicant should ensure that relevant Welsh legislation is referred to within the ES, and that marine fish listed as a Priority Species under Section 7 of Environment (Wales) Act 2016 are included.
3.4.8	Part 2, Table 4.10 and Part 3, Table 4.11	Underwater noise. (Generation assets and transmission assets)	The Proposed Development overlaps with high intensity spawning areas for several fish species, including cod which are a hearing species. The potential for piling noise to disrupt spawning activity for cod and other hearing species should be assessed.
3.4.9	Part 2, Section 4.2.6 and Part 3, Section 4.2.6	Mitigation. (Generation assets and transmission assets)	The Applicant should give consideration to controlling the time of the proposed construction and / or operational activities to avoid key and sensitive periods to species, such as fish spawning seasons and fish migration periods. Where this is not considered necessary or feasible, this should be justified in the ES.
3.4.10	n/a	Direct damage. (Generation assets and transmission assets)	The Scoping Report does not consider the potential for direct damage to species. Whilst the Inspectorate acknowledges that fish are generally a mobile receptor, some species have a close affiliation with the seabed (i.e. sand eel and herring) and may be reliant on specific

ID	Ref	Description	Inspectorate's comments
			habitat for part of their life stages. In addition, sedentary shellfish species have limited ability to move in order to avoid danger. The Inspectorate therefore considers that direct damage and disturbance to mobile demersal and pelagic fish and shellfish species should be scoped into the assessment for all phases of the development. Accordingly, the ES should include an assessment of these matters or evidence demonstrating agreement with the relevant consultation bodies that significant effects are not likely to occur.
3.4.11	n/a	Fish feeding grounds and over-wintering areas for crustaceans. (Generation assets and transmission assets)	The Scoping Report does not address potential impacts on fish feeding grounds or over-wintering areas for crustaceans. The ES should assess these impacts where significant effects are likely to occur.
3.4.12	n/a	Vessel collision with basking shark.	The ES should assess the potential for vessel collision on basking shark and any significant effects that are likely to occur.

3.5 Marine mammals

Scoping Report Part 2, Section 4.3 (Generation Assets) and Part 3, Section 4.3 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Part 2, paragraph 4.3.4.18 and Part 3, paragraph 4.3.4.16	White beaked dolphin. (Generation assets and transmission assets)	The Scoping Report states that white beaked dolphin is only an occasional visitor to the Irish Sea and that none were identified in the digital aerial surveys. The Inspectorate considers that a high-level qualitative assessment should be presented within the ES, the scope of which should be agreed with the Expert Working Group (EWG).
3.5.2	Part 2, paragraph 4.3.4.52 and Part 3, paragraph 4.3.4.50	Harbour seal. (Generation assets and transmission assets)	Harbour seal have been observed in the site-specific digital aerial surveys. The Scoping Report states that low numbers of harbour seals are encountered along the coasts of Wales but that they do not occur in high densities within the regional marine mammal study area. The Inspectorate does not agree that harbour seal can be scoped out of the assessment. The Applicant should agree the scope of a high-level assessment for this species with the EWG.
3.5.3	Part 2, Table 4.16 and Part 3, Table 4.17	Accidental pollution during all phases. (Generation assets and transmission assets)	The Scoping Report proposes to scope out accidental pollution resulting from all phases of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environmental Management Plan and its constituent MPCP. The ES should also explain how such measures will be secured.
3.5.4	Part 2, Table 4.16	Increased SSC and associated sediment deposition during all phases.	The Scoping Report states that marine mammals are known to forage in tidal areas where water conditions are turbid and visibility conditions are poor and there is large natural SSC variability within

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Part 3, Table 4.17	(Generation assets and transmission assets)	the study area. It further notes that sediments are expected to rapidly dissipate over one tidal excursion. The Inspectorate agrees that these impacts are unlikely to result in significant effects to marine mammal foraging and therefore this matter can be scoped out.
3.5.5	Part 2, Table 4.16 and Part 3, Table 4.17	Impact of EMF (from surface lain or buried cables) during the operation and maintenance phase. (Generation assets and transmission assets)	The Inspectorate notes the references to literature which conclude there is no evidence that EMF related to marine renewable devices have any impact on marine mammals and agrees that this matter can be scoped out of the ES.
3.5.6	Part 2, Table 4.16	Disturbance to marine mammals from operational noise from wind turbine operation during the operation and maintenance phase. (Generation assets)	The Inspectorate notes the references to literature and monitoring at other wind farms which conclude that any potential impact from operational wind turbines would be negligible. However, these are dated from 2011 and 2014 and turbine output and size has greatly increased since. In the absence of evidence that the proposed turbines would have comparable noise outputs, the Inspectorate does not agree this matter can be scoped out of the ES. The Inspectorate considers that underwater noise modelling should be undertaken for wind turbine generators that are of representative size for the Proposed Development.

ID	Ref	Description	Inspectorate's comments
3.5.7	Part 2, Section 4.3.2 and Part 3,	Study area. (Generation assets and transmission assets)	The Inspectorate notes advice from NRW, NE, the Joint Nature Conservation Committee (JNCC) and the Isle of Man Government (see Appendix 2 of this Opinion) that the Marine Mammal Management Unit (MMMU) is the appropriate scale for consideration of the regional impacts for marine mammals, as opposed to the Irish Sea

ID	Ref	Description	Inspectorate's comments
	Section 4.3.2		geographical area presented, and advises the Applicant to apply this study area within the ES.
3.5.8	Part 2, paragraph 4.3.3.3	Site-specific surveys. (Generation assets)	The Scoping Report explains that aerial digital marine mammal surveys collected 30% of the sea surface and 12% was analysed. The ES should explain the rationale behind the 12% value and demonstrate that the survey coverage is appropriate to provide adequate baseline characterisation. The ES should include reference to any agreements reached through the EWG, including relevant consultation bodies such as NRW and NE.
3.5.9	Part 2, Table 4.12 and Part 3, Table 4.13	Desktop data. (Generation assets and transmission assets)	A number of datasets proposed to be used to inform the regional marine mammal study area (i.e. outwith the site-specific survey area) are more than 10 years old. Whilst it is acknowledged site-specific surveys have been undertaken, the Applicant should ensure that the baseline data used in the ES assessments are sufficiently up to date to provide a robust baseline. The ES should make use of the Defra Marine Noise Registry as appropriate.
3.5.10	Part 2, Table 4.15 and Part 3, Table 4.16	Potential impacts. (Generation assets and transmission assets)	The ES should assess impacts to marine mammal feeding areas, birthing areas/haul out sites, nursery grounds and known migration or commuting routes where significant effects are likely to occur.
3.5.11	Part 2, Section 4.3.6 and Part 3, Section 4.3.6	Mitigation. (Generation assets and transmission assets)	The Offshore ornithology aspect chapters (Part 2, Section 4.4 and Part 3, Section 4.4) propose a Vessel Management Plan (VMP) to include measures to minimise disturbance to rafting seabirds. The VMP should also outline measures to reduce the risk of collision with marine mammals.

ID	Ref	Description	Inspectorate's comments
3.5.12	Part 2, Section 4.3.7 and Part 3, Section 4.3.7	Proposed assessment methodology. (Generation assets and transmission assets)	The ES should fully describe the methodology applied, including Permanent Threshold Shift (PTS), Temporary Threshold Shift (TTS) and disturbance ranges used. The potential for the disturbance impact footprints to overlap with the boundary of offshore designated sites, including the North Anglesey Marine/Gogledd Môn Forol SAC, should be identified. If noise modelling indicates an overlap of the disturbance footprint with an offshore designated site, the area and duration of such disturbance will need to be assessed against the conservation objectives of the designated site.
3.5.13	Part 2, paragraph 4.3.8.2 and Part 3, paragraph 4.3.8.2	Cumulative effects. (Generation assets and transmission assets)	The Scoping Report states that the key cumulative effect is likely to come from underwater noise from pile driving. It is unclear whether any of the other impact pathways proposed to be assessed for the project alone will be considered in the cumulative effects assessment. The ES should provide a list of pathways that are being screened in or out of the CIA, with rationale to support screening out pathways.
3.5.14	Part 2, Section 4.3.10 and Part 3, Section 4.3.10	Transboundary impacts. (Generation assets and transmission assets)	The potential impacts listed in Section 4.3.10 are not consistent with those listed in Part 2, Table 4.15 and Part 2, Table 4.16 (i.e. it does not include injury to marine mammals due to collision with vessels and disturbance from pre-construction surveys). The Inspectorate considers that all potential impacts identified to these mobile species should also be addressed in the transboundary effects assessment.

3.6 Offshore ornithology

Scoping Report Part 2, Section 4.4 (Generation Assets) and Part 3, Section 4.4 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Part 2, Table 4.20 and Part 3, Table 4.20	Direct disturbance and displacement impacts from underwater noise during operation and maintenance and decommissioning phases. (Generation assets and transmission assets)	The Inspectorate notes conflicting statements in the Scoping Report, as Part 2 Table 4.19 and Part 3 Table 4.19 indicate that this matter ('disturbance and displacement from… …underwater noise…') is scoped in for the operation and maintenance and decommissioning phases. However, Part 2, Table 4.20 and Part 3, Table 4.20 states that 'Direct disturbance and displacement impacts from underwater noise during operation and maintenance and decommissioning phases' is to be scoped out. With regards to the generation assets the Inspectorate concurs with the view that in the unlikely event that low levels of noise result in displacement of birds away from wind turbines, this impact would already be accounted for by the above-water operational displacement assessment. Therefore, the Inspectorate agrees that underwater noise as a result of the operation of the wind turbines for the generation assets during the operation and maintenance phase can be scoped out of the assessment. With regards to the transmission assets, the Inspectorate is content that underwater noise from operation and maintenance activities would not result in significant effects and therefore this matter can be scoped out. The ES description of development should clearly set out the maintenance activities for the transmission assets to support this position. The Inspectorate acknowledges that no piling is proposed for decommissioning of either generation and transmission assets, However, Part 2, Table 3.5 of the Scoping Report identifies potential disturbance during decommissioning due to jacket or monopile

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			cutting and removal. In the absence of sufficient justification with regards to likely sources and levels of underwater noise from decommissioning activities, the Inspectorate is of the view that the ES should include an assessment of this matter, where significant effects are likely to occur.
3.6.2	Part 2, Table 4.20 and Part 3, Table 4.20	Accidental pollution during all phases of the Mona Offshore Wind Project. (Generation assets and transmission assets)	The Scoping Report proposes to scope out accidental pollution resulting from all phases of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environment Management Plan and its constituent MPCP. The ES should also explain how such measures will be secured.
3.6.3	Part 3, Table 4.20	Collision risk during the operation and maintenance phase. (Transmission assets)	The Inspectorate agrees that collision risk to birds from the offshore booster station structures is unlikely and is therefore content to scope this matter from the ES.
3.6.4	Part 3, Table 4.20	Barrier to movement during the operation and maintenance phase. (Transmission assets)	Although the Scoping Report states that it is anticipated that the offshore booster station (if required), will be located within the Mona Offshore Transmission Infrastructure Scoping Search Area around the mid-point of the offshore export cable corridor, it also acknowledges that the location is not yet known. Should the offshore booster station be located in close proximity to the wind turbines it may collectively add to a potential barrier to movement. In the absence of sufficient justification at this time, the ES should include an assessment of this matter, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.6.5	Part 2, Paragraphs 4.4.2.1 to 4.4.2.4, 4.4.3.2 and Figure 4.21	Study area. (Generation assets)	The Inspectorate proposes a range (4km to 10km) within the study area proposed for the offshore ornithology aspect chapter. The ES should clearly state and provide justification for the final study area adopted in the impact assessment. It should also be supported by a figure(s) clearly presenting the extent of the buffer and where these buffer distances differ. The study area should be based on the Zone of Influence (ZoI) for the Proposed Development. The Applicant's attention is directed to the recent issue of the 'Joint SNCB1 Interim Advice on the treatment of displacement for red-throated diver (2022)' with regards to revised guidance for red-throated diver displacement. The Inspectorate advises that the marine ornithology study area should include the array area and a minimum 10km buffer. Where the buffer does not consistently reach 10km, the ES should clearly justify the approach.
3.6.6	Part 2, Table 4.17	Data sources. (Generation assets)	Tracking studies should also be used to inform and evidence connectivity (or a lack of) for the marine ornithology impact assessment, where available, such as site-specific tracking data for Northern gannet at Grassholm, Manx shearwater at Skomer and the Copeland Islands, black-legged kittiwake at Rockabill, and guillemot at Isle of Canna.
3.6.7	Part 2, Section 4.4.4	Baseline environment. (Generation assets)	The ES should consider those birds listed on Schedule 1 of the Wildlife Act 1990 (Isle of Man) and refer to the Manx Birds of Conservation Concern (2021) when considering conservation status of Manx birds (where relevant).
3.6.8	Part 2, Paragraph 4.4.3.2 and Part 3, Paragraphs	Site-specific surveys. (Generation assets and transmission assets)	The Scoping Report explains that aerial digital marine mammal surveys collected 30% of the sea surface and 12% was analysed. The ES should explain how the site-specific aerial digital surveys have been determined, including justification of the 12% analysis value and the selection of the transect distance and alignment. The ES

ID	Ref	Description	Inspectorate's comments
	4.4.3.2 and 4.4.3.4		should clearly demonstrate that the survey coverage is appropriate to provide adequate baseline characterisation. The ES should include reference to any agreements reached through the EWG with relevant consultation bodies such as NRW and NE. With regards to the transmission assets, the Scoping Report at Part 3 indicates no further site-specific aerial digital surveys are planned of the Mona offshore ornithology study area for the transmission assets as it is expected that the bird assemblage recorded during these site-specific surveys in the 4km to 10km buffer area will also be representative for the majority of the marine areas within the study area for the transmission assets. The Applicant should seek to agree the scope of any further surveys to inform the transmission assets with the EWG, including NRW and NE.
3.6.9	Part 2, Figure 4.22	Designated sites (Generation assets)	The Applicant's attention is directed to the response of the Isle of Man Government at Appendix 2 to this Opinion with regards to designated sites and in particular the Calf of Man National Bird Observatory.
3.6.10	Part 2, Paragraph 4.4.4.11	Designated sites (Generation assets)	The Scoping Report proposes to determine connectivity between breeding seabird colonies at designated sites and the Proposed Development through the application of the metric 'mean maximum (plus one standard deviation)'. Until the site-specific surveys are complete, and the data analysis finalised, it may be prudent to scope in all SPAs, Ramsar sites, and SSSIs with marine or estuarine bird qualifying features to the impact assessment. The Applicant should seek to agree the appropriate metric with relevant consultation bodies, including NRW and NE.
3.6.11	Part 2, Paragraphs 4.4.7.1 to 4.4.7.9 and	Assessment methodology. (Generation assets and transmission assets)	The Scoping Report states that the displacement matrix approach for the transmission assets may be modified (in terms of the appropriate displacement and mortality rates) to assess the potential temporary impact of disturbance during installation of the offshore export cables.

ID	Ref	Description	Inspectorate's comments
	Part 3, Paragraph 4.4.7.2		If fundamental disagreements remain regarding the assessment methods and modelling for assessing effects from displacement and collision-related mortality, the ES should include assessments based on the Applicant's preferred method and those advocated by NRW and NE. The Applicant is advised to agree the detailed assessment methodologies with relevant stakeholders represented on the ornithology EWG.
3.6.12	Part 2, Paragraph 4.4.7.3	Flight height data. (Generation assets)	It is unclear from the Scoping Report how the Applicant intends to determine flight heights and whether this will be taken from the digital aerial survey data only. However, the Scoping Report does state such information would be collected 'where possible'. The ES should confirm the approach taken and also consider use of generic flight heights agreed with the EWG where possible.

3.7 Commercial fisheries

Scoping Report Part 2, Section 5.1 (Generation Assets) and Part 3, Section 5.1 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Part 2, Table 5.3	Increased steaming distances during the operation and maintenance phase. (Generation assets)	The Inspectorate agrees that this matter can be scoped out on the basis that once operational, fishing vessels will be able to transit through the array area to/from adjacent fishing grounds and therefore significant effects are not likely.
3.7.2	Part 3, Table 5.3	Interference with fishing activity (all phases). (Transmission assets)	The Scoping Report does not provide evidence to support the assertion that activities will be temporary and that the number of vessels required is unlikely to significantly add to the marine traffic already present. Part 3, Figures 5.6 and 5.7 depict landings values and vessel activity. These show quite a large spatial variation across the offshore transmission infrastructure scoping search area. Impacts may therefore be of differing magnitude depending on the final location of the export cable corridor and associated structures (such as the offshore HVAC substation). In the absence of a more defined project description and further information on the duration of activities and the number of vessels, the Inspectorate considers it premature to scope out this matter for the construction and decommissioning phases. Taking into account the operational and maintenance characteristics of the Proposed Development, the Inspectorate considers the number of vessels required for such activities would be unlikely to result in significant effects and agrees the matter can be scoped out for the operation and maintenance phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Part 3, Table 5.3	Increase in steaming distances (all phases). (Transmission assets)	The Inspectorate agrees significant increases in steaming distances from the installation, maintenance, and decommissioning of the transmission assets are unlikely. This matter can therefore be scoped out.

ID	Ref	Description	Inspectorate's comments
3.7.3	Part 2, Section 5.1.3 and Part 3, Section 5.1.3	Baseline. (Generation assets and transmission assets)	When using landings data, any conservation or management measures for species captured in the vicinity of the windfarm should be considered and acknowledged, as this may affect the species abundance and distribution within the windfarm area. The Applicant should make effort to include, or otherwise account for, vessels excluded from the Vessel Monitoring Systems data.
3.7.4	Part 2, Table 5.3	Displacement of fishing activity into other areas. (Generation assets)	The Scoping Report identifies this as a potential impact to take place throughout all phases of the development, however, defines the displacement as temporary. The ES should clearly define the duration of temporary impacts and distinguish between true short term temporary effects and those that are longer term and reversible.
3.7.5	n/a	Invasive non-native species.	The ES should assess the potential for the introduction of hard substrate and vessel movements to facilitate the spread of INNS (e.g. via ballast water and through accidents and spillages) and the potential for impacts upon commercial fisheries, where significant effects are likely to occur. Where significant effects are likely to occur, the ES should also consider the potential for climate change-related effects to facilitate the spread and exacerbate the impacts of INNS.

ID	Ref	Description	Inspectorate's comments
3.7.6	n/a	Impacts from increased vessel activity.	This aspect chapter of the Scoping Report does not propose to assess impacts from increased vessel activity, for example collision and allision risk. The Inspectorate expects appropriate cross reference to be made to the Shipping and navigation chapter of the ES to ensure that all potential impacts on commercial fisheries are assessed.

3.8 Shipping and navigation

Scoping Report Part 2, Section 5.2 (Generation Assets) and Part 3, Section 5.2 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.8.2	Part 2, Section 5.2.2 and Part 3, Section 5.2.2	Study area. (Generation assets and transmission assets)	A study area of 10 nautical miles (nm) has been proposed for the shipping and navigation assessment. The ES should explain the rationale behind the choice of study area and, where possible, the approach should be discussed with the relevant consultation bodies.
3.8.3	Part 2, Section 5.2.4 and Part 3, Section 5.2.4	Future baseline. (Generation assets and transmission assets)	The ES should identify a future baseline for vessel movements and explain how this has been established, taking into account the existing sea users and the numerous proposed projects in the vicinity.
3.8.4	Part 2, Section 5.2.6 and Part 3, Section 5.2.6	Mitigation measures. (Generation assets and transmission assets)	Trinity House has suggested a number of risk mitigation measures (see Appendix 2 of this Opinion), which the Applicant is advised to take into consideration for the Proposed Development.

ID	Ref	Description	Inspectorate's comments
3.8.5	Part 2, paragraph 5.2.7.10 and Part 3, paragraph 5.2.7.10	Assessment methodology. (Generation assets and transmission assets)	The Scoping Report proposes to determine significance as either broadly acceptable, tolerable, or unacceptable. The ES should clearly set out how the risk assessment approach leads to an assessment of significance of effect consistent / compatible with the terminology as set out in Part 1, Section 4.5.4 of the Scoping Report.

3.9 Marine archaeology

Scoping Report Part 2, Section 5.3 (Generation Assets) and Part 3, Section 5.3 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Part 2, Table 5.9 and Part 3, Table 5.6	Alteration of sediment transport regimes – construction and decommissioning. (Generation assets and transmission assets	This matter is proposed to be scoped as indicated by a cross under the 'phase' column, however, is scoped into the Physical Processes aspect chapter (Part 2, Table 3.2 and Part 3, Table 3.3). In the absence of a justification in relation to impacts on marine archaeology, the Inspectorate does not agree that this matter should be scoped out. The ES should assess any impacts on marine archaeological assets, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.9.2	Part, Section 5.3.2 and Part 3, Section 5.3.2	Study area.	Some of the potential impacts to be assessed result from changes to marine physical processes. The study area to be used for the marine archaeological assessment is different to that proposed for the assessments of physical processes. The ES should provide a justification for the extent of the study area used in the marine archaeological assessment, in light of the potential for impacts from physical processes over a wider extent.

3.10 Other sea users

Scoping Report Part 2, Section 5.4 (Generation Assets) and Part 3, Section 5.4 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.10.2	n/a	n/a	No comments

3.11 Seascape, landscape and visual resources (Offshore and onshore combined topics)

Scoping Report Part 2, Section 6.1 (Generation Assets) and Part 3, Section 9.1 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Part 3, Table 9.3	The impact of construction, operation and maintenance and decommissioning of the generation and transmission assets on seascape and landscape character and visual resources located beyond the seascape, landscape and visual study area for generation and transmission assets.	The Scoping Report states that the study area is to be based on a Zone of Theoretical Visibility (ZTV) and that receptors would be agreed with relevant stakeholders for both generation and transmission assets. The Applicant should seek to agree the extent of the ZTV with relevant consultation bodies.
3.11.2	Part 3, Table 9.3	The impact of operation and maintenance of the offshore and onshore export cables on seascape and landscape character and visual resources.	The Inspectorate acknowledges that export cables would be fully submerged or buried underground. The Inspectorate agrees that in general the introduction of the export cables is unlikely to give rise to significant long-term effects on seascape and landscape character and visual resources during operation of the Proposed Development. However, it is unclear whether any easement required would result in permanent landscape changes and the potential for such effects should be considered. The ES should also assess the potential for significant short-term effects during the beginning of the operational phase, as proposed reinstatement measures mature along the export cable route.
3.11.3	Part 3, Table 9.3	The impact of decommissioning of the offshore and onshore export cables on seascape and landscape character and visual resources.	Part 1, paragraph 3.8.1.2 of the Scoping Report anticipates that all cabling equipment would be left in situ when the Proposed Development is decommissioned. As such, the Inspectorate is content to scope out this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.4	Part 3, paragraph 9.1.8.6	Cumulative effect of the operation, maintenance and decommissioning of the offshore and onshore export cables.	On the basis that all cables would be fully submerged or underground during operation and would be left in situ when the Proposed Development is decommissioned, the Inspectorate is content that cumulative effects are unlikely to be significant. Therefore, this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.11.5	Part 3, paragraph 9.1.2.3	Study area.	A 50km buffer from the outer edge of the wind turbine array is proposed. Justification should be provided within the ES that this is sufficient to identify and likely significant effects, based on the wind turbine height for the Proposed Development.
3.11.6	Part 3, paragraph 9.1.7.9	Maturity of planting.	The ES should detail the expected levels of screening that would be established within the '10 years establishment' timeframe of mitigation planting and the assumptions made in this regard.

3.12 Socioeconomics and community (Offshore and onshore combined topics)

Scoping Report Part 2, Section 6.2 (Generation Assets) and Part 3, Section 9.4 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Part 3, Table 9.10	Tourism and community effects within the National Impact Area (NIA).	The Inspectorate agrees that the Proposed Development is unlikely to result in significant effects on tourism and community at a national level. Therefore, this matter can be scoped out.
3.12.2	Part 3, 9.4.8.3	Cumulative impact of onshore transmission assets during operation.	The Scoping Report notes that all cabling equipment will be underground. As such, the Inspectorate is content to scope out this matter. The Scoping Report does not specifically refer to potential cumulative effects from the operation of the generation assets. However, the Inspectorate does not consider that significant effects are likely and therefore this matter can also be scoped out.

ID	Ref	Description	Inspectorate's comments
3.12.3	Part 3, Table 9.9	The impact on economic receptors.	Whilst the Inspectorate acknowledges the potential for positive economic impacts on employment and supply chain, the ES should also identify and assess any negative economic impacts, for example to commercial fisheries, where significant effects are likely to occur.

3.13 Aviation and radar

Scoping Report Part 2, Section 6.3 (Generation Assets) and Part 3, Section 9.2 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Part 2, Table 6.4	Potential disruption to Helicopter Main Routes (HMRs) due to presence of wind turbines. (Generation assets)	The Inspectorate is content to scope this matter out, noting that Part 2, Figure 6.3 shows that the nearest HMRs to the Proposed Development do not cross the array area.
3.13.2	Part 2, Table 6.4 and Part 3, Table 9.6	Increased helicopter traffic may affect available airspace for others. (Generation assets and transmission assets)	The Scoping Report states that the Proposed Development would be located within Class G (uncontrolled airspace) where pilots are responsible for the avoidance of terrain, obstacles and other aircraft and that an air traffic service is available. The Inspectorate agrees that this matter can be scoped out.
3.13.3	Part 2, Table 6.4	Disruption to meteorological radar. (Generation assets)	The Scoping Report states that the Proposed Development is outside of the Met Office defined consultation zones for each meteorological radar system. The Inspectorate is content that this matter can be scoped out of the ES.
3.13.4	Part 2, Table 6.4	Impacts to Secondary Surveillance Radar (SSR) systems. (Generation assets)	The Scoping Report states there are no SSR systems within 10km of the Proposed Development. The Inspectorate considers that, in accordance with Civil Aviation Authority (CAA) Guidance: *CAA Policy and Guidelines on Wind Turbines,* potential interference to SSR systems is unlikely to be significant and therefore agrees that this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.5	Part 3, Table 9.6	Potential disruption to HMRs due to the presence of the offshore substation platforms (OSPs) or the offshore booster substation. (Transmission assets)	Although the transmission study area slightly overlaps with one HMR, the Inspectorate is content that consultation between the helicopter and platform owner would mean significant effects are unlikely to occur. As such, this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.13.6	Part 2, Figure 6.3	Practice and exercise (PEXA) areas. (Generation assets and transmission assets)	Part 2, Figure 6.3 identifies PEXA areas within the study area, however no assessment of impacts to these areas is proposed in Part 2, Table 6.3. An assessment of impacts to PEXA areas should be undertaken in consultation with relevant consultation bodies, where significant effects are likely to occur.
3.13.7	Part 2, Figure 6.2	Airspace above the Mona Potential Array Area. (Generation assets)	The different classes of air space are not easily discernible in Part 2, Figure 6.2. The ES should include clear figures delineating airspace classes.
3.13.8	Part 2, Table 6.3	Radar systems – receptors. (Generation assets)	Part 2, paragraph 6.3.4.10 identifies Clee Hill Primary Surveillance Radar (PSR) as being within the declared operational range of the Mona Potential Array Area but states that initial radar line of sight modelling results indicate it may not theoretically detect wind turbines. Part 2, Table 6.3 omits this PSR from the proposed assessment. NATS has identified that an assessment is required for this radar (see Appendix 2 of this Opinion). NATS has also identified the Proposed Development as being located within the assessment area for Claxby Radar.

ID	Ref	Description	Inspectorate's comments
			An assessment of likely significant effects to these radar systems should be presented within the ES.

3.14 Climate change

Scoping Report Part 2, Section 6.4 (Generation Assets) and Part 3, Section 9.3 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Part 2, Table 6.7 and Part 3, Section 9.3	The vulnerability of the generation and transmission assets to climate change during the construction, operation and maintenance and decommissioning phase. (Generation assets and transmission assets)	Part 2, paragraph 6.4.1.4 proposes to scope out a climate change risk assessment on the basis that climate change will be assessed in relevant topic chapters of the ES. Part 2, Table 6.7 states that the risk of flooding to the onshore transmission assets will be assessed with appropriate allowances for climate change within a standalone Flood Risk Assessment (FRA) and offshore elements would be designed to be resilient to storm events. It is also proposed that cooling systems would be designed with sufficient capacity to take into account the increased cooling demand for the equipment as a result of climate change. The Inspectorate is content that the vulnerability of the Proposed Development to flooding can be assessed within a standalone FRA, provided that any likely significant effects are reported within the ES. The Applicant should ensure that the most recent climate change allowances are taken into account in the Applicant's assessment. However, the FRA would not address the vulnerability of the Proposed Development to other climate-related risks for example storm frequency, wind strength and wave strength and height. As such the Inspectorate is of the opinion that this matter cannot be scoped out at this stage. The ES should assess the likely significant effects relating to the vulnerability of the Proposed Development to climate change. The ES should also describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development (i.e. the cooling systems).

3.15 Other environmental topics for which no ES chapter is proposed

Scoping Report Part 2, Section 7 (Generation Assets) and Part 3, Section 10 (Transmission Assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Part 2, Section 7.2.1 and Part 3, Section 10.2.1	Human health – standalone chapter. (Generation assets and transmission assets)	The Applicant proposes to scope out a standalone aspect chapter on Human health on the basis that potential impacts on human health will be assessed within other aspect chapters of the ES and an overall conclusion of the significance of effects on human health will be included within a technical appendix. The Inspectorate is content that Human health does not need to be considered as a standalone aspect chapter.
3.15.2	Part 2, paragraph 7.2.1.1	Scope of human health impacts to be assessed. (Generation assets)	The Scoping Report states that potential impacts on health arising from the generation assets would be considered in the following ES topics: • physical processes; • commercial fisheries; • shipping and navigation; • socio-economics and community; and • other sea users. However, there are no references to assessing impacts on human health within these chapters and no further details provided in Part 2, Section 7.2.1. As such, the Inspectorate is unclear what the Applicant proposes to assess. The Applicant should seek to agree the scope of the assessment of impacts on health with relevant consultees.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.3	Part 3, paragraph 10.2.1.8	Human health - operational and maintenance phase impacts. (Transmission assets)	Part 3, paragraph 10.2.1.8 proposes to scope out impacts resulting from: • emissions to air; • emissions to water, land and soil; • contamination risks to worker or the public; • changes to access to PRoW or open space; • employment opportunities. The Inspectorate is content that significant effects on health are unlikely to occur as a result of these impacts during the operation and maintenance phase and agrees that these matters can be scoped out of the ES.
3.15.4	Part 3, Section 10.2.1	Human health – heat. (Transmission assets)	The Inspectorate agrees that the transmission assets are unlikely to produce levels of heat likely to generate significant effects on human health and agrees that this matter can be scoped out.
3.15.5	Part 3, Section 10.2.1	Human health – radiation. (Transmission assets)	Radiation (electro-magnetic fields (EMF)) is proposed to be scoped out on the basis that the perimeter fence of the substation provides screening of the electric field. However, the Proposed Development also involves up to 12 onshore export cables up to 275kV and up to 12 grid connection export cables up to 400kV, the proposed cable corridors of which are yet to be confirmed. Furthermore, paragraph 2.4.5.1 states that there is the potential requirement for a 400kV link to connect the new proposed substation to the existing National Grid Bodelwyddan substation. In line with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			A Voluntary Code of Practice 2012), above and below ground cables above 132kV have potential to cause EMF effects. In the absence of information, including the location of the cable corridor and sensitive receptors, the Inspectorate is not in a position to agree to scope out this matter at this stage. The ES should demonstrate the design measures take to avoid the potential for EMF effects on receptors from all onshore components, including overhead and buried cables and the substation.
3.15.6	Part 2, Section 7.2.2 and Part 3, Section 10.2.2	Waste – standalone chapter. (Generation assets and transmission assets)	The Applicant proposes to submit a Waste Management Plan (referred to as the Site Waste Management Plan (SWMP) in Part 3 of the Scoping Report) as a technical appendix to the ES which contractors would be required to follow. It would also identify the likely waste arisings from the construction of the generation assets and set out appropriate measures for managing the waste in accordance with the waste hierarchy principle. The Inspectorate agrees that based on the nature of the Proposed Development significant effects from the disposal and recovery of waste during construction are unlikely to occur and that a standalone aspect chapter on waste can be scoped out.
~~3.15.7~~	Part 2, Section 7.2.2 and Part 3, Section 10.2.2	Operational waste. (Generation assets and transmission assets)	Operational waste is proposed to be scoped out on the basis that the operation and maintenance of the Proposed Development will generate only limited amounts of waste. It also states that waste collection procedures will be included in an Operational Management Plan. The Inspectorate agrees that this matter can be scoped out.

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
3.15.8	Part 2, Section 7.3.2 and Part 3, Section 10.3.1	Local planning policy context. (Generation assets and transmission assets)	The Applicant proposes to scope out a standalone Local Planning Policy chapter on the basis that a description of the consenting process will be outlined in the introductory chapters and that relevant legislation and planning policy context will be outlined within each of the aspect chapters. A Planning Statement will also be provided. The Inspectorate is content with this approach.
3.15.9	Part 2, Section 7.3.3 and Part 3, Section 10.3.2	Daylight, sunlight and microclimate. (Generation assets and Transmission assets)	The Applicant proposes to scope out daylight, sunlight and microclimate on the basis that the location of the generation assets and the fact that the above ground elements of the transmission assets do not include tall buildings means it is unlikely that significant effects would occur in relation to these aspects. The Inspectorate has considered the characteristics of the Proposed Development and is content that these aspects can be scoped out on the basis that significant effects are unlikely to occur.
3.15.10	Part 2, Section 7.3.4	Heat (Generation assets)	The Applicant proposes to scope out heat on the basis that generation assets are not likely to generate significant levels of heat. It is stated that heat generation from the offshore booster station will be prevented through technical design measures. The Inspectorate agrees this matter can be scoped out. The ES description of development should explain the design measures that control heat generation.
3.15.11	Part 2, Section 7.3.4	Radiation. (Generation assets)	The Applicant proposes to scope out a standalone chapter on radiation on the basis that effects relating to electric and magnetic fields (EMFs) from the offshore booster station and inter-array cables will be considered in the benthic ecology and

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
			Fish and shellfish chapters of the ES. The Inspectorate is content that a standalone chapter is not required, but as noted in Section 3.3 of this Opinion, does not agree this matter can be scoped out.

ID	Ref	Aspects proposed to be covered elsewhere in the ES	Inspectorate's comments
3.15.12	Part 2, Section 7.4.2 and Part 3, Section 10.4.1	Other residues and emissions. (Generation assets and transmission assets)	The Applicant proposes to scope out other residues and emissions (e.g. dust, pollutants, light, noise, vibration) as a standalone aspect chapter on the basis that these matters will be considered within other chapters of the ES. The Inspectorate is content with this approach.
3.15.13	Part 2 paragraph 7.4.3 and Part 3, paragraph 10.4.2	Material assets. (Generation assets and transmission assets)	The Applicant proposes to scope out a standalone chapter on Material assets on the basis that this will be considered within other aspect chapters of the ES. The Inspectorate is content with this approach.
3.15.14	Part 2 Section 7.4.4 and Part 3, Section 10.4.2.3	Major accidents and disasters. (Generation assets and transmission assets)	The Scoping Report states that Major Accidents and Disasters will not be considered as a standalone chapter but instead will be incorporated into other relevant aspect chapters of the ES as described in Part 2, Section 7.4.4 and Part 2, Section 10.4.2.3.It is also proposed that the design measures taken to avoid major accidents and disasters will be described within the Project Description chapter of the ES. The Inspectorate is content that

ID	Ref	Aspects proposed to be covered elsewhere in the ES	Inspectorate's comments
			major accidents and disasters does not need to be assessed within a standalone aspect chapter. However, the Inspectorate notes the following: • Part 2, paragraph 7.4.4.3 and Part 3, paragraph 10.2.7 state that major accidents and disasters relating to the vulnerability of the Proposed Development to climate change will be assessed within the Climate Change aspect chapter, yet this matter is proposed to be scoped out in Part 2, Table 6.7. • The Health and Safety Executive (HSE) has identified numerous Major Accident Hazard Pipelines and Major Hazard Installations in the Onshore Transmission Infrastructure Scoping Search Area (see Appendix 2 of this Opinion). The Applicant must ensure that any likely significant effects from the above matters are assessed within the ES.

3.16 Geology, hydrogeology and ground conditions

Scoping Report Part 3, Section 6.1 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Part 3, Table 6.3	The impact of accidental spillages/contaminant release on the quality of groundwater ground receptors during operation and maintenance of the onshore transmission assets.	The Scoping Report proposes to scope out accidental pollution resulting from construction, operation and decommissioning of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environment Management Plan. The ES should also explain how such measures will be secured.

ID	Ref	Description	Inspectorate's comments
3.16.2	Part 3, paragraphs 6.1.3.1 to 6.1.4.6	Assessment methodology.	The Scoping Report does not propose any intrusive site investigation to inform the baseline, relying instead on desk-based sources. The Inspectorate considers that limiting the approach to desk study only may not provide sufficient baseline information to inform the assessment. The Applicant is advised to discuss and agree the need for intrusive site investigation with NRW and the relevant local authority.
3.16.3	Part 3, Section 6.2.6	Mitigation.	The Applicant should consider whether a Materials Management Plan (MMP) is required, and if so, consider the use of the Contaminated Land: Applications in Real Environments

ID	Ref	Description	Inspectorate's comments
			(CL:AIRE) Definition of Waste: Code of Practice (DOW:COP) and donor / receiver site process.

3.17 Hydrology and flood risk

Scoping Report Part 3, Section 6.2 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Part 3, Table 6.9	The impact of contaminated runoff on the chemical and biological status of surface water receptors arising from the operation and maintenance of the onshore transmission assets.	The Inspectorate agrees that operation and maintenance activities are unlikely to generate contaminated runoff and thus there will be low potential for likely significant effects with regards to pollution. The Inspectorate agrees that this matter can be scoped out of further assessment.
3.17.2	Part 3, Table 6.9	The impact of accidental spillages/contaminant release on the quality of surface water and ground receptors during operation and maintenance of the onshore transmission assets.	The Scoping Report proposes to scope out accidental pollution resulting from construction, operation and decommissioning of the Proposed Development. The Inspectorate agrees that such effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Environment Management Plan. The ES should also explain how such measures will be secured.
3.17.3	Part 3, Table 6.9	The impact of increased flood risk arising from damage to existing flood defences during the operation and maintenance of the onshore transmission assets.	The Inspectorate agrees that operation and maintenance activities are unlikely to result in significant effects on the integrity of existing flood defences and that this matter can be scoped out of the ES.
3.17.4	Part 3, Table 6.9	The impact of increased flood risk arising from additional surface water runoff during the	The Scoping Report states that the slight rise in impermeable land associated with the onshore transmission assets is unlikely to give rise to likely significant effects relating to drainage

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance of the onshore export cable.	patterns and surface water runoff rates. The Inspectorate agrees that this matter can be scoped out of the ES on this basis.

ID	Ref	Description	Inspectorate's comments
3.17.5	Part 3, Table 6.8	Sustainable drainage system (SuDS).	If the Proposed Development is to implement SuDS during the construction, operation or decommissioning phase e.g. at the onshore substation, the location and design of the SuDS should be described in the ES and included on a figure(s).
3.17.6	Part 3, Table 6.8	Existing flood defences.	Conwy County Borough Council and Denbighshire County Council have both noted that there are pending applications for coastal defence schemes along the North Wales coastline (see Appendix 2 of this Opinion). The Applicant should consider the potential for cumulative effects with these applications or whether they form part of the future baseline.

3.18 Terrestrial ecology and intertidal birds

Scoping Report Part 3, Section 7.1 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	Part 3, Table 7.4	The impact of temporary and permanent habitat loss on protected habitats and species during operation and maintenance of the onshore transmission assets.	On the basis of the likely small scale and nature of habitat loss associated with the operation and maintenance of the onshore transmission assets, the Inspectorate is content that this matter can be scoped out of the assessment.
3.18.2	Part 3, Table 7.4	The impact of pollution caused by accidental spills/contaminant release on protected habitats and species during operation and maintenance of the onshore transmission assets.	The Scoping Report proposes to scope out accidental spills/contaminant release from operation and maintenance activities for the Proposed Development. The Inspectorate agrees that these effects are capable of mitigation through standard management practices and can be scoped out of the assessment. The ES should provide details of the proposed mitigation measures to be included in the Ecological Management Plan. The ES should also explain how such measures will be secured.
3.18.3	Part 3, Table 7.4	The impact of construction, operation and maintenance and decommissioning of the onshore transmission assets on species not listed in paragraph 7.1.3.4 of this EIA Scoping Report, including red squirrel, brown hare, fish, and aquatic invertebrates.	The justification for scoping out effects to such species relies upon the avoidance of large parcels of woodland and main watercourses, together with the use of environmentally sensitive construction techniques (such as HDD), and the temporary nature of habitat disturbance and reinstatement requirements. As the likely onshore transmission route and thus likely presence/absence of such species potentially affected by the Proposed Development is not yet known, and as it is not yet known whether techniques such as HDD will be feasible for all locations, the Inspectorate does not agree that effects on species (such as those listed in Part 3, Table 7.4 and not in paragraph

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			7.1.3.4) can be scoped out of the assessment at this stage. The ES should include an assessment of important ecological receptors/features, where likely significant effects could occur.

ID	Ref	Description	Inspectorate's comments
3.18.4	Part 3, Paragraphs 7.1.3.4 to 7.1.3.5	Survey methodologies.	The Scoping Report confirms that the detailed scope, methodologies and extents of the site-specific surveys identified will be agreed with NRW in advance of survey commencement. The ES should provide a clear rationale and a justification as to the approach undertaken to the surveys used to inform the assessment, including reference to agreements reached with relevant consultation bodies, such as NRW.
3.18.5	Part 3, Table 7.1 and Paragraph 7.1.3.4	Data sources and surveys – great crested newt (GCN)	The Applicant's attention is directed to the comments made by Denbighshire County Council at Appendix 2 to this opinion with regards to nationally important populations of GCN in the St Asaph/Bodelwyddan area of Northeast Wales. The Applicant is encouraged to consult with the local authority ecologists with regards to data sources and the scope of the ecological surveys, to ensure that regional and local biodiversity issues are adequately addressed in the ES, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.
3.18.6	n/a	Confidential annexes.	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be

			subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.19 Historic Environment

Scoping Report Part 3, Section 8.1 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	Part 3, Table 8.4	The impact on the buried archaeological assets during the operation and maintenance and decommissioning phases.	The Inspectorate agrees that direct physical impacts to buried archaeological assets during operation, maintenance and decommissioning are unlikely and is content that any effects arising from indirect impacts are scoped into the assessment as a separate mater. The Inspectorate agrees that this matter can be scoped out of the ES.
3.19.2	Part 3, Table 8.4	The impact on the setting of above ground historic assets arising from operation and maintenance of the onshore transmission assets (excluding the onshore substation), including the onshore export cables and associated infrastructure.	The Inspectorate agrees that direct physical impacts on the setting of above ground historic assets during operation, maintenance and decommissioning are unlikely and is content that any effects arising from indirect impacts are scoped into the assessment as a separate mater. The Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.19.3	n/a	n/a	No comments.

3.20 Land use and recreation

Scoping Report Part 3, Section 8.2 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.20.1	Part 3, Table 8.7	Disruption and reduced access to agricultural land during operation and maintenance of the onshore transmission assets.	The Applicant proposes to scope out the impact of disruption and reduced access to agricultural land during operation on the basis that any permanent effects on agricultural land would occur during the construction phase and impacts during the operational phase would be limited to maintenance and repair activities which would be small in magnitude and infrequent. The Inspectorate agrees this matter can be scoped out on this basis.
3.20.2	Part 3, Table 8.7	Disruption and reduced access to recreation resources during operation and maintenance of the onshore transmission assets.	The Applicant proposes to scope out impacts arising during the operational phase on the basis that impacts will be limited to maintenance and repair activities which would be small in magnitude, short term and infrequent and so potential effects are unlikely to be significant. The Inspectorate agrees this matter can be scoped out on this basis.

ID	Ref	Description	Inspectorate's comments
3.20.3	n/a	n/a	No comments.

3.21 Traffic and transport

Scoping Report Part 3, Section 8.3 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.21.1	Part 3, Table 8.10	The impact of additional vehicle movements on the Local Road Network (LRN) and Strategic Road Network (SRN) on driver and pedestrian delay, community severance, public transport delay and accidents and safety during the operation and maintenance phase of the onshore transmission assets.	The Scoping Report states that during the operational and maintenance phase, the onshore transmission assets will only need to be visited for maintenance purposes as there are no manned facilities and the assets would be monitored remotely. The Inspectorate agrees that on this basis, significant operation and maintenance traffic related effects are unlikely to occur and assessment of this matter can be scoped out of the ES. The ES should provide a description of the likely number and type of vehicles required during all phases of development to support this conclusion.
3.21.2	Part 3, Table 8.10	The impact of additional vehicle movements on the LRN and SRN on driver and pedestrian delay, community severance, public transport delay and accidents and safety during the decommissioning phase of the onshore transmission assets.	The Scoping Report anticipates that the retired onshore infrastructure/ equipment will either be left in situ or transported away from site in bulk during the decommissioning phase. The Scoping Report therefore predicts that there will be a lower number of vehicle movements on the LRN and SRN during decommissioning compared to the construction phase. The Inspectorate also understands that a decommissioning plan will be prepared post consent (Part 1, paragraph 3.8.1.2). The Inspectorate is content that the assessment of the construction phase would represent a worst case and therefore agrees a detailed assessment of decommissioning traffic impacts can be scoped out of the ES. However, the ES should explain the approach taken.
3.21.3	Part 3, Table 8.9	The impact of Abnormal Indivisible Loads (AILs) on the	The impact of AILs has been excluded from the operation, maintenance and decommissioning phase columns in Part 3,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		safety of users of the LRN, SRN and other transport receptors during the operation and maintenance and decommissioning phases.	Table 8.9, however it is not identified as a 'scoped out impact' in Part 3, Table 8.10. Taking into account the nature of the operation and maintenance, the Inspectorate is content that this matter can be scoped out. The Inspectorate is also content that the assessment of the construction phase would represent a worst case and therefore considers a detailed assessment of decommissioning traffic impacts can be scoped out of the ES. However, the ES should explain the approach taken.

ID	Ref	Description	Inspectorate's comments
3.21.4	Part 3, Table 8.9	Public rights of way (PRoW).	The ES should confirm whether any permanent diversions or closures of PRoW would be required during the operational phase. The ES should include an assessment of the impact of any permanent diversions and closures on users of PRoW including walkers, cyclists and equestrians, where significant effects are likely to occur.

3.22 Noise and vibration

Scoping Report Part 3, Section 8.4 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.22.1	Part 3, Table 8.12	The impact on human receptors and historic assets arising from vibration generated by additional vehicle movements on the local highway network during construction and decommissioning of the onshore transmission assets.	Vehicle routes are not yet known and therefore the distance to any human receptor or historic asset is unknown. In addition, the number and type of vehicles has not been determined. For these reasons, the Inspectorate cannot agree to scope out construction traffic vibration effects during construction at this time. For the reasons described in ID 3.21.2 above, if the ES can demonstrate that effects during the decommissioning phase will be equal or less than those in the construction phase, the Inspectorate can agree to scope out a detailed assessment for the decommissioning phase.
3.22.2	Part 3, Table 8.12	The impact on human receptors and historic assets arising from vibration generated during operation and maintenance of the onshore transmission assets.	The Inspectorate is content that vibration from the operation and maintenance of the onshore export cable and grid connection cables is unlikely to result in significant effects and agrees this matter can be scoped out of the ES. With regards to the onshore substation, the Inspectorate is not in a position to agree to scope out this matter as the location of the substation is yet to be determined the distance to any human receptor or historic asset is unknown. The Scoping Report does not provide sufficient information on the anticipated vibration levels from the substation. Accordingly, the ES should include an assessment of these matters or the information demonstrating agreement with relevant stakeholders and the absence of likely significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.22.3	Part 3, Table 8.12	The impact of noise and vibration generated during operation and maintenance of the onshore export cable.	On the basis of the limited operation and maintenance required, the Inspectorate is content that significant noise and vibration effects are unlikely to occur and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.22.4	Part 3, paragraphs 8.4.2.1 to 8.4.2.4	Study area for noise and vibration sensitive receptors.	The Scoping Report proposes a study area that focuses on where potential impacts to noise sensitive receptors are likely to occur and which differs for different project elements (i.e. array, cables and onshore substation). A 50km study area is proposed to identify noise sensitive receptors located landward of Mean High Water Springs (MHWS) that could be affected by piling of the offshore generation assets; this area should be justified based on the results of the noise modelling.
3.22.5	n/a	Construction vehicles and equipment.	Information should be provided in the ES on the types of vehicles and plant to be used during the construction phase. Where uncertainty exists over the likely vehicles and equipment to be used the assessment should adopt a 'worst case' for receptors, i.e. that within the application boundary the vehicles and plant are at the closest possible point to a receptor.
3.22.6	n/a	Sensitive ecological receptors.	The Scoping Report makes limited reference to noise and vibration effects on terrestrial ecological receptors. The Inspectorate considers that such effects should be considered as part of the ES for all phases, where relevant. Appropriate cross referencing should be provided between the noise and vibration chapter and relevant biodiversity chapters.

3.23 Air quality

Scoping Report Part 3, Section 8.5 (Transmission assets)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.23.1	Part 3, Table 8.17	The impact on human and ecological receptors (dust soiling and human health) arising from fugitive dust emissions generated during operation and maintenance of the onshore transmission assets.	The Inspectorate agrees that the activities associated with the operation and maintenance of the onshore transmission assets are unlikely to generate large quantities of dust and therefore it is unlikely that any likely significant effect will arise in relation to humans and ecological receptors. As such, this can be scoped out of the ES.
3.23.2	Part 3, Table 8.17	The impact on human and ecological receptors arising from air emissions generated by vehicle traffic during operation and maintenance of the onshore transmission assets.	The Inspectorate agrees that it is unlikely that there would be a significant change in vehicle flows during operation and maintenance and therefore it is also unlikely that significant effects would occur in respect of air quality. However, the ES should confirm that the anticipated road vehicle movements are below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) screening values, and if values are exceeded then an assessment of likely significant effects should be provided.
3.23.3	Part 3, Table 8.17	The impact on human and ecological receptors arising from air emissions generated by plants or stacks during operation and maintenance of the onshore transmission assets.	The Proposed Development does not include proposals for the construction of plants or stacks and therefore air emissions arising from these components are unlikely to arise during the operational and maintenance phase. For this reason, the Inspectorate agrees this can be scoped out of the ES.

4. SCOPING REPORT ANNEXES

4.1 Transboundary screening, Water Framework Directive screening and Marine Conservation Zone screening

(Scoping Report Part 4)

ID	Ref	Description	Inspectorate's comments
4.1.1	Part 4, Annex A	Transboundary impacts screening.	The Applicant proposes to screen out an assessment of transboundary effects for the following aspect chapters: • offshore: – physical processes; – benthic subtidal and intertidal ecology; – marine archaeology; – other sea users; • onshore – geology and ground conditions; – hydrology and flood risk; – terrestrial ecology and intertidal birds; – historic environment; – land use and recreation; – traffic and transport; – noise and vibration; – air quality; • offshore and onshore combined

ID	Ref	Description	Inspectorate's comments
			– seascape, landscape and visual resources – socio-economics and community; – aviation and radar The Inspectorate agrees that significant transboundary effects on the above aspects are unlikely and can be scoped out of the ES with the following exceptions: • 'Other sea users' – Limited evidence and no quantified analysis has been provided to demonstrate that there would be 'lower levels of offshore cruising and racing' between the UK and Ireland; therefore this matter should be scoped in. • 'Terrestrial ecology and intertidal birds' – the Scoping Report asserts that *"due to the large distance between the Mona Onshore Transmission Infrastructure Search Area and Natura 2000 sites located outside the UK, it is not considered feasible that migratory birds directly associated with Natura 2000 sites in other states would be disturbed or suffer from loss of foraging or resting opportunities in any way that would result in likely significant effects on those Natura 2000 sites"* (Part 4, Annex A, paragraph 1.4.3.5). The Inspectorate considers that there is insufficient evidence to predict that significant transboundary effects will not arise and does not agree that this matter can be scoped out of the assessment at this stage. Accordingly, the ES should include an assessment of these matters or information demonstrating the absence of LSE. The Inspectorate will undertake an initial transboundary screening exercise on behalf of the Secretary of State under

ID	Ref	Description	Inspectorate's comments
			Regulation 32 of the EIA regulations, following adoption of the Scoping Opinion.
4.1.2	Part 4 Annex B,	Water Framework Directive (WFD) screening.	The Inspectorate has no comments on the proposed scope of the WFD screening but notes that advice from NRW is provided at Appendix 2 of this Opinion.
4.1.3	Part 4 Annex C	Marine Conservation Zones (MCZ) screening.	The Inspectorate has no comments on the proposed scope of the MCZ screening assessment.

5. APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[1]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Welsh Ministers	Welsh Government
The Health and Safety Executive	Health and Safety Executive
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	North Wales Fire and Rescue Service
The relevant police and crime commissioner	North Wales Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Betws yn Rhos Community Council
	Llanfairtalhaiarn Community Council
	Llannefydd Community Council
	Abergele Town Council
	Llysfaen Community Council
	Llanddulas and Rhyd-y-Foel Community Council
	Towyn and Kinmel Bay Town Council
	Prestatyn Community
	Cefn Meiriadog Community
	Bodelwyddan Town Council
	Rhyl Community
	Tremerichion, Cwm and Waen Community Council

[1] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	St. Asaph City Council
	Rhuddlan Town Council
	Dyserth Community
The Equality and Human Rights Commission	Equality and Human Rights Commission
Royal Commission On Ancient and Historical Monuments Of Wales	Royal Commission On Ancient and Historical Monuments Of Wales
The Natural Resources Body for Wales	Natural Resources Wales
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - Holyhead Maritime Rescue Coordination Centre
The Marine Management Organisation	Marine Management Organisation (MMO)
The Scottish Fisheries Protection Agency	Marine Scotland Conservation
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Conwy County Borough Council
	Denbighshire County Council
The Passengers Council	Transport Focus
The Disabled Persons Transport Advisory Committee	Disabled Persons Transport Advisory Committee
The Coal Authority	The Coal Authority
Office of Rail and Road	Office of Rail and Road
Approved Operator	Network Rail Infrastructure Ltd
	Network Rail (High Speed) Ltd
The Gas and Electricity Markets Authority	OFGEM
The Water Services Regulation Authority	Ofwat

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant waste regulation authority	Natural Resources Wales
The relevant internal drainage board	Afon Ganol (East & West)
Trinity House	Trinity House
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The relevant local resilience forum	North Wales Resilience Forum Secretariat
The Crown Estate Commissioners	The Crown Estate
The Natural Resources Body for Wales	Natural Resources Wales
The relevant local health board	Betsi Cadwaladr University Health Board
The National Health Service Trusts	Health Protection Team Public Health Wales
	Welsh Ambulance Services Trust
	Velindre NHS Trust
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[2]

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Trust	Health Protection Team Public Health Wales
	Welsh Ambulance Services Trust
	Velindre NHS Trust
The relevant local health board	Betsi Cadwaldr University Health Board
Railways	Network Rail Infrastructure Ltd

[2] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	Highways England Historical Railways Estate
Dock and Harbour authority	Rhyl (Foryd Harbour)
	Conwy Harbour
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	Natural Resources Wales
The relevant water and sewage undertaker	Hafren Dyfrdwy Limited
	Dwr Cymru (Welsh Water)
The relevant public gas transporter	Cadent Gas Limited
	Last Mile Gas Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Murphy Gas Networks limited

STATUTORY UNDERTAKER	ORGANISATION
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity generator with CPO Powers	Gwynt Y Mor Offshore Wind Farm
	Burbo Bank Extension
	Awel y Mor Offshore Wind Farm Limited
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Forbury Assets Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	SP Distribution Plc

STATUTORY UNDERTAKER	ORGANISATION
	SP Manweb Plc
The relevant electricity transmitter with CPO Powers	Diamond Transmission Partners BBE Limited
	Gwynt y Mor OFTO plc
	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[3]

LOCAL AUTHORITY[4]
Snowdonia National Park Authority
Powys County Council
Flintshire County Council
Wrexham County Borough Council
Gwynedd Council
Conwy County Borough Council
Denbighshire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

[3] Sections 43 and 42(B) of the PA2008

[4] As defined in Section 43(3) of the PA2008

ORGANISATION
Welsh Language Commissioner
Trafnidiaeth Canolbarth Cymru (TraCC)
Isle of Man Government
Royal National Lifeboat Institution
Cadw
Isle of Anglesey County Council
Cheshire West and Chester Council
Liverpool City Council
West Lancashire Borough Council
Fylde Borough Council
Lancashire County Council
Sefton Council
Wirral Metropolitan Borough Council

6. APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Cadw
Conwy County Borough Council
Denbighshire County Council
Dwr Cymru (Welsh Water)
Fylde Borough Council
Hafren Dyfrdwy Limited
Health and Safety Executive
Historic England
Isle of Man Government (Territorial Seas Committee)
Joint Nature Conservation Committee
Lancashire County Council
Maritime and Coastguard Agency
National Grid Electricity Transmission Plc
NATS (En-Route) Plc
Natural England
Natural Resources Wales
Network Rail
Powys County Council
Public Health Wales
Royal Commission on the Ancient and Historical Monuments of Wales
SP Energy Networks
The Coal Authority
Towyn and Kinmel Bay Town Council

Trinity House
UK Health Security Agency

Cadw

Llywodraeth Cymru
Ty'r Afon
Heol Bedwas
Caerffili CF83 8WT

Welsh Government
Ty'r Afon
Bedwas Road
Caerphilly CF83 8WT

[redacted]

cadw.llyw.cymru

cadw.gov.wales

Hannah Terry
Senior EIA Advisor
The Planning Inspectorate

Eich cyfeirnod Your reference	EN010137 -000009
Ein cyfeirnod Our reference	
Dyddiad Date	30 May 2022
Llinell uniongyrchol Direct line	[redacted]
Ebost Email:	Cadwplanning@gov.wales

Dear Hannah

Scoping consultation - Mona Offshore Wind Farm

Thank you for your letter of 5 May asking for Cadw's opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the above Proposed Development.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

A scoping report for the proposed EIA has been prepared by RPS and this contains 2 chapters regarding to the impact of the proposals on the Off Shore and Onshore Historic Environment.

Chapter 5.3 Marine Archaeology
Cadw has not identified any issues with the contents of this chapter but recommend that the Senior Investigator (Maritime) at the Royal Commission on the Ancient and Historic Monuments in Wales should be consulted on this chapter.

Chapter 8.1 Onshore Historic Environment
In general, we concur with the scope of proposed assessment of the impact of the proposals on the on-shore historic environment. However, as the on-shore elements of

the project are in Wales the impact of the proposed development on the settings of designated historic assets should follow the Welsh Government guidance given in “The Setting of Historic Assets in Wales” and The Welsh Ministers criteria for the determination of national importance when scheduling monuments given in Technical Advice Note 24: The Historic Environment should be used.

Yours sincerely

Jenna Arnold

Diogelu a Pholisi/ Protection and Policy

Gwasanaethau Rheoleiddio a Thai / Regulatory and Housing Services
Pennaeth Gwasanaeth / Head Of Service – Peter Brown

Adain Rheoli Datblygu ac Adeiladu / Development & Building Control Section
Rheolwr Rheoli Datblygu ac Adeiladu / Development & Building Control Manager – Paula Jones

Cyfeiriad Post / Postal Address: Blwch Post 1, CONWY / PO Box 1, CONWY, LL30 9GN;

[**Dolen i'r Hysbysiadau Preifatrwydd:** *http://www.conwy.gov.uk/cy/YCyngor/Mynediad-at-Wybodaeth/Hysbysiadau-Preifatrwydd/Hysbysiadau-Preifatrwydd.aspx*.
Link to Privacy Notices*: http://www.conwy.gov.uk/en/Council/Access-to-Information/Privacy-Notices/Privacy-Notices.aspx*]

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Gofynnwch am / Please ask for: **Ceri Thomas**
[redacted]
[redacted]**@conwy.gov.uk**

Ein Cyf / Our Ref: **DC/ENQ/31240**
Eich Cyf / Your Ref: **EN010137-000008**
Dyddiad / Date: **01/06/2022**

Site / Location: Mona Offshore Wind Project

Proposal: Application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

Dear The Planning Inspectorate

Re: Consultation on the Scoping Report

Thank you for your letter dated 5th May 2022, requesting the Council's views on the Scoping Report submitted pursuant to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

I would like to provide the following response on behalf of Conwy County Borough Council.

Preliminary matters

Regulation 10(3) of the EIA Regulations requires that a request for a Scoping Opinion shall include:

a) A plan sufficient to identify the land …

The plans comprised in the Scoping Report identify very extensive areas of search for both the onshore and offshore transmission assets, which make it impossible to identify with any degree of precision which assets and constraints are likely to be impacted by the development. Whilst the Council recognises that the Rochdale Envelope approach allows a certain degree of flexibility in identifying the parameters of the project, it considers it unfortunate that connection routes have been identified only by reference to broad areas of search and criteria.

Notwithstanding these concerns, the Council would like to make the following specific comments on the Scoping Report.

9.1 – Seascape, Landscape and Visual Resources

Section 9.1.4 identifies the designations which are to be identified. The Great Orme Heritage Coast and the Wales Coastal Path should both be identified as receptors, and the ES should address the impacts of the development on these assets.

9.4 Socio-Economics and Community

Table 9.9 proposes to scope into the project assessment "the impact of disruption on tourism and recreation receptors during the construction, operation and maintenance, and decommissioning phase". Table 9.7 identifies the areas which would be included as LIA impact centres. However, it is unclear whether Conwy County Borough would still be included as a LIA if the landfall and onshore transmission assets were located outside the County Borough. The development would potentially impact on tourism and recreation over a wide area, and the ES should address impacts of the development on the vitality, viability and attractiveness of tourism destinations over a wider area, including (but not limited to) Llandudno, Conwy, Colwyn Bay and Abergele, giving particular regard to the special character and ambience of Llandudno as a Victorian resort.

10.3 Topics Proposed to be Scoped Out of the ES

The Scoping Report proposes to scope out the local planning policy context. The Council considers that thus matter should be scoped into the ES as the project could potentially impact on the delivery of the Local Development Plan. In the absence of any precise identification of the location of onshore transmission assets, the Council cannot rule out the possibility that the proposal would not sterilise site allocations and proposals and hence adversely impact on the delivery of housing, employment and other objectives.

Other Matters

The ES should address the impact of the construction, operation and decommissioning phases on mineral resources, including permitted reserves and other mineral resources safeguarded in the Local Development Plan.

The ES should address the impact of the construction, operation and decommissioning phases on coastal defence works, including the proposed Llanddulas to Kinmel Bay coastal defence scheme.

The Council requests the Planning Inspectorate to include the above matters within its Scoping Direction.

Yn ddiffuant / Yours sincerely

[redacted]

ppPaula Jones
Rheolwr Rheoli Datblygu ac Adeiladu / Development and Building Control Manager

Eich cyf / Your ref EN010137-000008

Ein cyf / Our ref : DCO/2022/0420

Dyddiad / Date : 27 May 2022

Rhif union / Direct dial : 01824 706727

Hannah Terry
The Planning Inspectorate
Temple Quay House
2
The Square
Bristol
BS1 6PN

FAO Hannah Terry,

Ref: EN010137-000008

Application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

EIA Scoping consultation

In response to your letter dated 5 May, Denbighshire County Council would like to make the following observations on the above EIA Scoping Opinion Request:

Cumulative effects:

The Council has concerns with regards to cumulative effects of offshore and onshore works, and considers that both the construction and operational phases have potential to give rise to significant effects, and consider that construction and operational phases should be scoped in.

This is substantiated by the following commentary:

It is noted that the grid connection point is confirmed as the Bodelwyddan National Grid substation which is located on land to the south of St. Asaph Business Park, and therefore the onshore works (landfall, cable route and new substation) are likely to be within the administrative boundary of Denbighshire County Council.

The County already hosts a number of renewable energy schemes and associated electrical infrastructure, and therefore the Council wish to stress the need for cumulative effects to be scoped in for both the offshore and onshore elements.

There are also a number of heritage assets in the onshore area of search, including scheduled monuments, listed buildings and registered parks and gardens, including Rhuddlan Castle and Bodelwyddan Castle.

Gwasanaethau Cynllunio a Gwarchod y Cyhoedd, Caledfryn, Ffordd Y Ffair, Dinbych, Sir Ddinbych LL16 3RJ
Ffôn: [redacted]
e-bost: cynllunio@sirddinbych.gov.uk Gwefan: www.sirddinbych.gov.uk

Planning and Public Protection Services, Caledfryn, Smithfield Road, Denbigh, Denbighshire, LL16 3RJ
Phone: [redacted]
e-mail: planning@ denbighshire.gov.uk Website: www.denbighshire.gov.uk

Electrical infrastructure including high voltage underground cables and overhead lines and windfarm substations converge around the St. Asaph area due to the presence of both a transmission network substation (National Grid Bodelwyddan substation) and distribution network substation (Scottish Power St. Asaph substation). There is also a flexible gas fired power station at TRB Drive on the St. Asaph business park.

The substations for the existing Gwynt y Mor offshore windfarm and the Burbo Bank offshore windfarm are already sited close the National Grid Bodelwyddan substation, and the proposed Awel y Mor offshore windfarm is also proposing to connect to the Bodelwyddan NG substation and the Awel y Mor offshore windfarm scheme is proposed a new substation on agricultural land to the north-west of the Bodelwyddan substation (Awel y Mor offshore windfarm is subject to a DCO application – PINS ref: EN010112).

Furthermore, there are two large solar farm developments proposed in the St. Asaph Area. Both are Developments of National Significance (DNS) to be determined by Welsh Ministers which are in the planning system.

The solar farms are the Elwy Solar farm (DNS application currently being considered by Welsh Ministers – PEDW ref: DNS/3247619) and the St Asaph Solar Farm (EIA screening opinion submitted to PEDW which is under consideration – PEDW ref: CAS-01392-D2TSF3).

Files can be found on the PEDW website: https://planningcasework.service.gov.wales/

The proposed onshore works, and in particular the necessary onshore substation, which will be a very large structure and would likely require a greenfield site, has the potential to give rise to significant effects, in particular on landscape character, visual amenity and on setting of heritage assets, when considered in combination with the existing and proposed renewable energy and energy infrastructure development around the Bodelwyddan National Grid substation site, and therefore cumulative effects should be scoped in.

In terms of impacts of the potential landfall, it is noted that the area of search includes Rhyl and Prestatyn which are coastal towns with large areas of beach and the Wales Coastal path runs along the promenade. Tourism is a significant part of the local economy and a number of local businesses are located along the coast.

It should be noted that the Council has two pending major applications for coastal defence schemes along the Denbighshire coast (Central Prestatyn Coastal Defence Scheme (DCC Ref: 45/2021/1248) and the Central Rhyl Coastal Defence Scheme (45/2022/0271)). These are large infrastructure schemes which, should planning permission be granted, the construction phase would be around 2 years.

The Awel y Mor offshore windfarm is also proposing a landfall location at Ffrith Beach, Rhyl.

The coastal areas of Denbighshire will therefore be impacted by the construction of a series of major infrastructure schemes (coastal defence schemes and Awel y Mor offshore windfarm) and further offshore windfarm development with result in prolonged disruption from construction activities, which has the potential to significantly impact on recreational use of the beaches and the Wales Coastal path, public amenity, tourism and the local economy.

The cumulative impact of the construction phase on public amenity, tourism and local economy has the potential to give rise to significant effects and should be scoped in.

Best and most versatile (BMV) agricultural land:

Planning Policy Wales (PPW 11) Section 3.58 and 3.59 obliges weight to be given to protecting land of grades 1, 2, and 3a quality in the Agricultural land Classification (ALC). PPW 11 notes this land is considered to be the best and most versatile and justifies conservation as a finite resource for the future. It indicates that land of this quality should only be developed if there is an overriding need for the development, and either previously developed land or land of a lower grade is available, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

Whilst the location of onshore cable route and substation has not yet been defined, it should be noted that much of the land around the Bodelwyddan NG substation is shown to be BMV agricultural land on the Welsh Government Agricultural Land Classification predictive mapping.

As the area of search for the onshore works has not been defined, owing to the likely scale of the substation and required landtake, the scheme therefore has the potential to have significant effects on agricultural land quality, and therefore impact on BMV agricultural land should be scoped in.

Ecology / Biodiversity:

It should be noted that St. Asaph / Bodelwyddan area of North East Wales is home to nationally important numbers of great crested newt (GCN).

The grid connection point is the NG Bodelwyddan substation, which is close to known populations of GCN and GCN habitat features pepper the landscape.

Trees and hedgerow which may provide habitat for protected species may need to be removed to facility the construction of the substation and to lay underground cables.

The proposal therefore has the potential to impact on protected species, and ecological impacts should be scoped in for the construction and operational phases.

Yours faithfully,

EMLYN JONES

Head of Planning, Public Protection and Countryside Services

Gwasanaethau Cynllunio a Gwarchod y Cyhoedd, Caledfryn, Ffordd Y Ffair, Dinbych, Sir Ddinbych LL16 3RJ
Ffôn: [redacted]
e-bost: cynllunio@sirddinbych.gov.uk Gwefan: www.sirddinbych.gov.uk

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Phone: [redacted]
e-mail: planning@ denbighshire.gov.uk Website: www.denbighshire.gov.uk

Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Tel: [redacted]
E.mail: developer.services@dwrcymru.com

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: [redacted]
E.bost: developer.services@dwrcymru.com

The Planning Inspectorate
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 24/05/2022
Our Ref: PLA0065446
Your Ref: EN010137

Dear Sir

Grid Ref: SH788983 281809 393331
Site: Mona Offshore Wind Farm, Anglesey
Development: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11
Application by Mona Offshore Wind Limited for an Order granting Development Consent for Mona Offshore Wind Project
Scoping consultation

We refer to your consultation letter received in accordance with the above regulations. We have reviewed the documents available at this stage in the process and specifically the Scoping Request received:

Whilst we have no comments on the scoping opinion itself, the location of the proposed onshore infrastructure is unknown and therefore we would be grateful if the developer could contact us to discuss further so we can assess the impact on our assets.

We respectfully reserve the right to comment further on any matters and issues arising from ongoing and future consultation. However, we trust the above information is helpful at this stage and we look forward to continuing our engagement on the project prior and during the submission of an application to the Planning Inspectorate.

Finally, we would be grateful if all future correspondence relating to the project is directed to me at the above address. For any further information, please do not hesitate to contact me.

If you have any queries please contact the undersigned on [redacted] or via email at **developer.services@dwrcymru.com**

Please quote our reference number in all communications and correspondence.

glas
Glas Cymru Cyfyngedig

Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in Welsh and English

Dŵr Cymru Cyf, a limited company registered in Wales no 2366777. Registered office: Pentwyn Road, Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Yours faithfully,

Alaw Jones
Development Control Officer
Developer Services

glas
Glas Cymru Cyfyngedig

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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

The Planning Inspectorate
monaOffshireWindProject@planninginspectorate.gov.uk

Our Ref:	ENQ/22/0052
Your Ref:	EN010137-000009
Please Ask For:	Rob Buffham
Telephone:	[redacted]
Email:	[redacted]@fylde.gov.uk
Date:	18th May 2022

Dear Sir/ Madam,

Re: EN010137-000009 – Application by Mona Offshore Wind Limited for an Order Granting development Consent for the mona Offshore Wind Project. Scoping consultation with non-prescribed consultation bodies – Planning Act 2008 and The Infrastructure Planning (EIA) regulations 2017, Regulation 10.

I refer to your correspondence dated 5th May 2022 concerning the above and our clarification with regards to the scope of information to be provided within the Environmental Statement (ES).

The applicants Scoping Report (May 2022) indicates the offshore wind project to be located some 30 miles off the western coastline of Fylde Borough Councils (FBC) administrative area. The same document confirms the landfall of all associated infrastructure for the Project to be along the north coast of Wales.

This distance between the off shore wind project and FBC administrative area would act to reduce visibility and prominence of the wind turbines on the seascape, when viewed from the many public vantage points on the coastline. Nonetheless, to understand what this visual impact might be and to help inform FBC comments to any subsequent planning application, FBC consider it necessary for a Landscape Visual Impact Assessment (LVIA) to be submitted with the Environmental Statement. The LVIA must consider visibility in important views from the FBC coastline.

Yours sincerely,

Rob Buffham
Senior Planning Officer

From: AP Planning HD
To: Mona Offshore Wind Project
Cc: [redacted]
Subject: RE: HD REF P-220510-36072
Date: 17 May 2022 10:28:04
Attachments: [redacted]

ST Classification: OFFICIAL PERSONAL

Good day,

This was passed into this department, but as no sewerage assets are affected by the works, we would have no comment to make.

Kind regards,

Rhiannon

Rhiannon Thomas
Planning Work Management Technician
Asset Protection
Asset Strategy & Planning
Chief Engineer, Hafren Dyfrdwy
E-mail : APPlanning@hdcymru.co.uk

Health and Safety Executive

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

FAO Ms Hannah Terry (Senior EIA Advisor)
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By email only: MonaOffshoreWindProject@planninginspectorate.gov.uk

Dear Ms Terry

11 May 2022

PROPOSED MONA OFFSHORE PROJECT (the project)
PROPOSAL BY Mona Offshore Wind Limited (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 5 May 2022 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

With reference to the blue outline area shown on drawing (Figure 6.1: Surface water plan for the Mona Onshore Transmission Infrastructure Scoping Search Area) found in RPS Document (Mona Offshore Wind Project Environmental Impact Assessment Scoping Report, May 2022), owing to the very extensive area of land, there are a number of Major Accident Hazard Pipeline(s) and Major Hazard Installation(s).

There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice**. However by way of general guidance, HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones.

** HSE's Land Use Planning Methodology [https://www.hse.gov.uk/landuseplanning/methodology.htm]

Should a new Major Accident Hazard Pipeline be introduced or existing Pipeline modified prior to the determination of the present application, then the HSE reserves the right to revise its advice.

If prior to the determination of the present application, a Hazardous Substances Consent be granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, then the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely,

Pp S Rance

Allan Benson
CEMHD4 NSIP Consultation Team

Historic England

Hannah Terry
Senior EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: EN010137-000008

27th May 2022

Dear Ms Terry,

Mona Offshore Wind Project Environmental Impact Assessment Scoping Report

Thank you for your email and letter of 5th May 2022 requesting our comments on the following document, as referenced:

> *Mona Offshore Wind Project Environmental Impact Assessment Scoping Report* (Doc Ref: MO_4000051_01-00_MM_CNS_AEA_Mona-Scoping-Report), Dated May 2022

In summary, we concur with the conclusions of the Environmental Report and the scoping in of impacts to marine archaeology as relevant to construction, operation and maintenance and decommissioning phases of this proposed development.

As you may be aware, Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in recognition of the English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act 2009 and the objectives and policies of published Marine Plans.

We understand that Energie Baden-Württemberg AG (EnBW) and bp are jointly developing the Mona Offshore Wind Project through their project company Mona Offshore Wind Limited and that the Mona Potential Array Area (MPAA) could be located in the eastern Irish Sea, 39.9km from the northwest coast of England.

The response offered here is exclusively focussed on any aspect of this proposed development as could occur within the English Marine Plan Area; although we appreciate that the proposed MPAA is predominantly located in Welsh offshore waters with parts of the boundary located within English offshore waters. We also note that the offshore export cables and related works located within and between MPAA and the landfall will be routed through the Mona Offshore Transmission Infrastructure Scoping Search Area, which overlaps with English waters, as illustrated by Figure 1.1 (Mona Array Scoping Boundary and Mona Potential Array Area).

We concur with the inclusion of marine archaeology within Table 1.2 (Topics within the EIA Scoping Report). We also noted the attention given in Section 5.3 to the Evidence plan process and in paragraph 5.3.1.4 the establishment of Expert Working Groups (EWG) is explained. Unfortunately, it appears that marine archaeology has not been included and we must direct the Applicant to contact our colleagues in the Welsh national curatorial body to ensure such an EWG is convened without delay.

Section 5.3 Marine archaeology – we noted the statement about the identification of "…marine archaeology receptors of relevance to the Mona Offshore Wind Project" A crucial aspect of any such identification is the appreciation of risk that this project will discovery presently unknown elements of the historic environment. We therefore appreciated the detail provided about accessing desk-top data and site-specific surveys (conducted in 2021).

In reference to the detail provided in the paragraphs under "Maritime archaeological potential", it is our advice that in consideration of the risk of encountering presently unknown cultural heritage (prehistoric environmental evidence or historic vessels and aircraft), that measures and procedures are established at an early stage of project planning. The benefit of adopting this approach is to ensure capacity is built in to inform design, so as to best deliver UK policy objectives for the protection of underwater cultural heritage.

Regarding the statements made in paragraphs 5.3.4.18 and 5.3.4.19, it is important to factor-in seabed sedimentary conditions whereby wrecked vessels of considerable antiquity may have become entombed and therefore the state of preservation is very high. Furthermore, such heritage assets may be very difficult to identify with geophysical survey data which was gathered to generally characterise the area within which the development could occur for EIA purposes. The risk that a presently identified anomaly with minimal 'signature' may actual represent buried archaeological material of considerable importance should always be factored in. We therefore concur with the statements made in Section 5.3.5 (Potential project impacts) that impacts have been scoped into the assessment as outlined in Table 5.9.

Regarding the guidance referred to in paragraph 5.3.7.1. we offer the following updates:

- *Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects*, as published by The Crown Estate in July 2021 (which now replaces the version published in 2010);
- Gribble J. and Leather S. (2011) *Guidance for Offshore Geotechnical Investigations and Historic Environment Analysis*: guidance for the renewable energy sector. Published by the former COWRIE Group; and
- Historic Environment Advice Note 15 Commercial Renewable Energy Development and the Historic Environment (2021). Published by Historic England: https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/

In consideration, that this development could predominantly occur within the Welsh marine planning area (as illustrated by Figures 5.14 and 5.16), we refer you to the national Welsh curator for the historic environment as the primary source of advice, as relevant to support preparation of any subsequent Preliminary Environmental Information Report and any eventual Environmental Statement prepared in support of a Development Consent Order application.

Yours sincerely,

[redacted]

Dr Christopher Pater
Head of Marine Planning

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Telephone [redacted]
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Isle of Man Government
Reiltys Ellan Vannin

infrastructure
bun-troggalys

Office of the Minister
and Chief Executive

Contact: Tracey Woods
Telephone: [redacted]
Email: [redacted]@gov.im
Date: 31st May 2022

Ms Hannah Terry
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN

Dear Ms Hannah Terry,

Re: Mona Offshore Wind Farm Scoping Opinion with non-prescribed consultation bodies (Your Ref EN010137-000009)

Thank you for your letter dated 5th May 2022 regarding the scoping opinion for the proposed Mona Offshore Wind Farm, providing the Isle of Man Government (as a non-prescribed consultation body) with the opportunity to review and comment on the Environmental Impact Assessment Scoping Opinion. This letter is a response from the Territorial Seas Committee (TSC) made up of representatives of a number of Departments and Statutory Boards of the Isle of Man Government.

The TSC found it a useful and interesting document and await the associates outcomes and future opportunity to comment as the project advances. The TSC is of the opinion that the Isle of Man should be identified as one of the main stakeholders given the proximity to the Manx territorial limits. Thank you for affording us with the opportunity to consider, and provide comments on the above.

The EIA Scoping Report provides a good overview of what will be undertaken as part of the early stages of this project. The TSC is satisfied from the information in these documents that all international environmental standards and best practice will be adhered to when undertaking the collection and analysis of the data obtained from within the proposed development area, and will ensure appropriate mitigation measures are in place to address any concerns identified throughout the Environmental Assessments process. The TSC also acknowledges the recent outcome of TCE's Habitats Regulations Assessment for the Mona site.

Whilst the Isle of Man is not a member of the EU and is therefore not directly covered by most European directives, the Isle of Man still follows relevant European environmental safeguards and expects best practice to be followed. The Isle of Man also meets its obligations under both the Bonn and the Bern Conventions, via statutory instruments, specifically the Wildlife Act 1990. As part of this, the TSC would request that appropriate consideration is given to the species which are protected under this Act, and ensure that there are no detrimental impacts on these species as part of this proposed project. In addition, the same would be requested in respect of the marine protected sites and the manner in which these are designated and managed, including any transboundary impacts arising from the project.

It is noted that the cumulative effects will be thoroughly investigated. However, of particular importance and concern would be the habitats and species found within Isle of Man waters, particularly those protected under Manx law[1] or identified as threatened or declining by the OSPAR Convention, and which may be affected by the proposed developments. Comments included below request the inclusion of relevant, island-based conservation organisations which may also have relevant information and data of interest to

[1] Wildlife Act 1990 (http://www.legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/1990/1990-0002/WildlifeAct1990_2.pdf)

the project. Any marine developments within or adjacent to the Isle of Man territorial waters could potentially impact commercial fisheries in Manx waters so it would be appreciated if the relevant fishing organisations on the island were included as consultees via the appointed Fisheries Liaison Officer.

The above proposal also has the possibility for potential trans-boundary impacts on Manx land/seascapes and the TSC would particularly like to ensure that the impacts on wildlife/habitat conservation and fisheries in Manx waters are fully considered within the scope of this assessment developments. We would request that the impact on infrastructure and transport activities, including but not limited to, Manx shipping and navigation and aviation interests, including airport radar issues are also fully considered.

Ørsted proposed offshore windfarm Agreement for Lease
The TSC wishes to point out that there is an AfL with Ørsted for an offshore windfarm within Isle of Man territorial waters, something which appears to have been omitted from a number of maps depicting neighbouring offshore windfarms (committee and future). It would be useful to include this as part of the assessment for Mona given that it is located at 32.8 kms / 17.7 nms from the Mona site.

Crogga Hydrocarbon site
The Department of Infrastructure has issued a Seaward Production Innovate Licence to Crogga Limited in respect of the hydrocarbon block 112/25. This licence commenced on 1st January 2019. Again, the TSC would draw this to your attention as it does not appear on any of your plans when oil and gas fields within the vicinity of the proposed Mona offshore windfarm are discussed. This block is located at 41.8km / 22.6nms from the Mona site.

Marine Navigation
As an island nation, any significant risk of interference with marine navigation is of concern to the TSC with regard to transport to and from the island, and the shipping lanes in our Territorial waters which are used to connect the UK and Ireland. The TSC is particularly concerned about the cumulative impacts from all of the proposed windfarms awarded as part of The Crown Estate's Round 4 project, and would want to see this fully taken into account as part of this EIA.

Data Sources
The TSC would draw the applicant's attention to the Manx Marine Environmental Assessment[2] (MMEA) which provides a useful overview of the Island's marine environment and should be taken into account as part of both the transboundary and possibly also the cumulative impacts assessment as part of this application. More detail will be provided below in respect of specific areas of the MMEA that should be reviewed.

In addition to this broad statement, the TSC has provided specific ccomments, over subsequent pages, in relation to the individual chapters of the Scoping Report, and collated on behalf of various contributors within the responsible Departments of the Isle of Man Government.

The TSC would welcome the opportunity for continued involvement in the process.

Should you require any further information or clarification on any of the contents of this response, then please do not hesitate to contact myself, and I can raise any items with the members of the TSC.

Yours sincerely

[redacted]

Mrs Emily Curphey
Interim Chief Executive
Chair, Territorial Seas Committee

[2] https://www.gov.im/about-the-government/departments/infrastructure/harbours-information/territorial-seas/manx-marine-environmental-assessment/

Chapter Specific Comments on Mona Scoping Report

As a neighbouring jurisdiction, it may be useful to draw attention to the Manx Marine Environmental Assessment[3], which is a reference report, specifically developed for marine planning and development processes. This report comprises a series of individual chapters, including a comprehensive summary of the Manx legislative system; https://www.gov.im/media/1363391/ch-12-legislative-system.pdf and would assist with some of the transboundary issues to be considered. This reference has been omitted from the list given at the back of the Scoping Report.

The areas of particular interest and relevance to the Isle of Man are expanded upon below.

Section 3 Offshore Physical Environment

3.2 Underwater Noise

Table 3.5 (pg. 147) 'Impacts proposed to be scoped into the project assessment for underwater noise'

- The TSC questions how the impacts of underwater noise on marine life can be determined if no data collection and analysis is proposed – see N/A entry and reference to the methodology in section 3.2.7.

- Section 3.2.7 methodology is largely focussed on marine mammal effects, but there is potential for effects on more than just marine mammals and fish.

- The TSC recommends that consideration within the methodology should be given to monitoring local shellfish (mollusc and crustacean) stocks, pre and post construction, and potentially including the long-term effects on larval settlement and recruitment processes.

Table 3.6 (pg. 149) Impacts proposed to be scoped out of the project assessment for underwater noise.

Justification

- (Table 3.6) Noting the rationale for scoping out the effects of the particle motion element of underwater noise on marine mammals during all phases that '*There is insufficient evidence that particle motion has any effect on marine mammals therefore this impact is scoped out of the Marine mammals ES chapter.*'

- Underwater noise has the potential to affect both fish and invertebrates as well as marine mammals. The argument that there is insuficient evidence or data does not preclude effects, and arguably makes the case for both a precautionary approcach and the collection of data, otherwise the opprtuntiy for better understanding potential imapcts and providing the most comprehensive baseline is lost.

- The TSC suggest that this issue is scoped in, and that appropriate monitoring and research is undertake as part of the proposed development.

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[3] https://www.gov.im/about-the-government/departments/infrastructure/harbours-information/territorial-seas/manx-marine-environmental-assessment/

Suggested references:

- Nedelec *et al.*, 2016. Particle motion: the missing link in underwater acoustic ecology. Methods in Ecology and evolution. PP. 836-842. Vol. 7 (7). https://besjournals.onlinelibrary.wiley.com/doi/10.1111/2041-210X.12544

- Popper and Hawkins (2018). The importance of particle motion to fishes and invertebrates The Journal of the Acoustical Society of America 143, 470. https://asa.scitation.org/doi/full/10.1121/1.5021594

- **The comments noted above are also considered relevant in relation to Part 3: Transmission assets**

Section 4 Offshore Biological Environment

4.1 Benthic subtidal and intertidal ecology
Study Area 4.1.2

- The Mona regional benthic subtidal and intertidal ecology study area for the generation assets (Figure 4.1): The straight line seems rather arbitrary from an effects perspective. The Isle of Man territorial Sea extends to 12 M from the baseline (or median line where applicable) and so, notwithstanding the inclusion of south-west Scotland (at some considerable distance) it appears odd that the south-western part of the Manx territorial sea has not been included. This appears to be neither an ecological or jurisdictional-based boundary decision and warrants further clarification.

- The TSC considers that from an Isle of Man perspective, it would be beneficial if, within the map RSPE-MN-SCO-017-00, that the IOM jurisdictional boundary is also included as there are varying legislative requirements and ecological connectivities within Manx waters, with potential implications for section 4.1.4. in consideration of ecological impacts, particularly to the south of Isle of Man. (See: Hinz *et al.*, 2012. Seabed habitats around the Isle of Man. Fisheries & Conservation report No. 12, Bangor University. pp.29)[4]

- The TSC would happily liaise with the applicant to provide appropriate GIS shapefiles directly where this is possible.

Table 4.1: Summary of key desktop datasets and reports

- Given the inclusion of a substantial part of the Manx territorial sea, and a request for complete inclusion, there are no datasets or reports indicated for the area of the Manx territorial sea.

- The TSC requests further engagement with the developers to ensure that Manx interests have been fully considered.

- A useful starting point, and one intended for development planning purposes, is the Manx Marine Environmental Assessment: https://www.gov.im/about-the-government/departments/infrastructure/harbours-information/territorial-seas/manx-marine-environmental-assessment/

- These reports, and specifically Chapter 3.3 (Subtidal Ecology) contains information that would improve upon the data provided, including in sections 4.1.4.18 (*Sabellaria*

[4] http://fisheries-conservation.bangor.ac.uk/iom/documents/12.pdf

- *spinulosa* and 4.1.4.19 (*Modiolus* reefs): https://www.gov.im/media/1363398/ch-33-subtidal-ecology.pdf

- Additional information on specific habitats may also be available from the Isle of Man Government.

Section 4.1.4.27 Designated Sites

- Noting Section 4.1.4.28 *'On the basis of this screening methodology, no sites with benthic features of nature conservation importance (European conservation sites (i.e. Special Areas of Conservation (SACs), Ramsar),* ***national designations*** *(i.e. Sites of Special Scientific Interest (SSSI), or Marine Conservation Zones (MCZs)) overlap with the Mona benthic subtidal and intertidal ecology study area for the generation assets, and therefore no sites have been screened into the EIA for the Mona generation assets.'*

- This is not correct, several statutorily designated Marine Nature Reserves occur in Manx waters, and within the boundary of the Mona benthic subtidal and intertidal ecology study area for the generation assets, including those with benthic habitat designation features.

- Please note, **these have been appropriately considered** within Section 4.2.4.25 (Fish and Shellfish), but not under this section, which is inconsistent and is considered to be an omission.

- The Territorial Sea Committee requests reassessment of this consideration, and with appropriate inclusion of these statutorily designated features. This issue may have arisen from the assumption that the Isle of Man has been an EU member state, and implements EU directives for nature conservation, which is not correct.

- For further information on Manx Marine Nature Reserves, their designation features and the Wildlife Act 2009, please refer to the following;

    - https://www.gov.im/mnr
    - https://www.gov.im/media/1362728/mnr-designation-order-2018-300920.pdf
    - https://www.gov.im/media/1362727/manx-marine-nature-reserves-byelaws-2018-sd-2018-0186-300920.pdf
    - https://www.gov.im/media/1371896/guidance-notes-for-marine-nature-reserve-designations-160221.pdf
    - https://www.gov.im/media/1363689/wildlife-act-1990.pdf

Section 4.1.4.30 Protected Species and Habitats:

- Further, consideration of the above should also be taken in relation to this Section, and with regard to the Wildlife Act 1990, specifically Schedule 5 (species protected under Manx law).

- Similarly **Table 4.3** should be re-assessed with respect to Manx Marine Nature Reserve legislation.

- The IoM Territorial Sea committee also requests appropriate consideration of the Manx designations and features within the future Habitats Regulation Assessment (HRA) process.

- Please also note that the Isle of Man is signatory to a number of statutory multilateral nature conservation agreements, extended via the UK, but under Manx jurisdiction within the terriotrial sea. For example; OSPAR Convention, Bonn Convention, Bern Convention, Convention on Biological Diversity.

- For further details please see https://www.gov.im/media/1346374/biodiversity-strategy-2015-final-version.pdf : Appendix B. Multilateral Environmental Agreements with biodiversity relevance extended to the Island

Table 4.5: Impacts proposed to be scoped out of the project assessment for benthic subtidal and intertidal ecology

- Impacts to benthic invertebrates due to electromagnetic fields (EMF).

- The committee notes that in Table 4.5 this section is scoped out but then indicates that **Impacts of EMF on shellfish species will be fully assessed in the Fish and shellfish ecology** ES Chapter (see part 2, section 4.2: Fish and Shellfish of the EIA Scoping Report.

- Section 4.2, Table 4.10 (Fish and Shellfish Ecology), acknowledges that '*EMF generated through the subsea electrical cabling may affect fish and shellfish prey/predator relationship by inhibiting/interfering with fish and shellfish behaviours due to changes in background EMFs*'.

- Table 4.10 also indicates that no specific modelling is required, and will be based on a 'thorough review of the available literature'. However Table 4.5 indicates that 'there is limited evidence on the electro sensitivity of benthic organisms and therefore the impact of EMFs on benthic invertebrates'

- As noted previously, limited evidence does not mean limited or no effect, and so the circular argument presented neither adequately assesses the potential effects of EMF on invertebrates (some of which are commercially valuable), nor advances the understanding of EMF-generating cables in the sea.

- As such, the Committee **seeks clarification as to how the Developer will assess the potential effects of EMF on benthic invertebrates noted above**, including commercially-important scallop stocks thought to be hydrologically-linked throughout the Irish Sea, and as indicated in Table 4.5.

4.1.10 Potential transboundary impacts

- Trans-boundary effects in relation to this indicator have been scoped out of the assessment, and the committee seeks reassurance that sufficient consideration of the potential impacts on sessile, commercially important fishery species have been adequately considered. Specifically, studies by Bangor University have indicated that, within the Irish Sea, there may be south-north connectivity of scallop and queen scallop grounds, and which may be important in relation to recruitment patterns further north, for example around the Isle of Man. This may be true of other species with plankton-dispersed larvae. The following should be considered to inform the EIA Scoping.

    - Neill, S.P. & Kaiser, M.J. (2008) Sources and sinks of scallops (*Pecten maximus*) in the waters of the Isle of Man as predicted from particle tracking models. Fisheries & Conservation report No. 3, Bangor University. Pp. 25 (http://fisheries-conservation.bangor.ac.uk/iom/documents/3.pdf); and,

- Close H. (2014) Connectivity between Populations of the Scallop *Pecten maximus* in the Irish Sea and the Implications for Fisheries Management. MSc thesis, Bangor University, pp 82.

- http://fisheries-conservation.bangor.ac.uk/iom/documents/11.pdf

4.2 Fish and shellfish ecology

4.2.2 Study area

- '*4.2.2.1 Fish and shellfish are spatially and temporally variable therefore, for the purpose of the fish and shellfish ecology characterisation, a broad study area has been defined. The Mona fish and shellfish ecology study area.*'

- As noted for **Section 4.1.2** ('The Mona regional benthic subtidal and intertidal ecology study area'), the Committee does not consider that the arbitrary straight line boundary is appropriate nor sufficient, and that, as for benthic subtidal and intertidal ecology, the study boundary for shellfish should be based either on scientifically validated ecological boundaries, or jurisdictional ones, particularly in respect of the Isle of Man.

- Fisheries management is based on either one, and it is believed that southern stocks, or areas of shellfish in Manx waters have important recruitment interactions with the east and west coasts of the island. See also 4.1.10 Transboundary Impacts (above).

4.2.3 Data sources

4.2.3.1 Table 4.6

- The Committee notes that there are no specific references to the extensive literature available for Manx shellfish (see also commercial fisheries comments).

- For example, the following are considered notable:
  - Manx Marine Environmental Assessment: https://www.gov.im/media/1363405/ch-41-fisheries.pdf
  - Bangor University Fisheries and Conservation Science Group: http://fisheries-conservation.bangor.ac.uk/iom/reports.php.en
    - including connectivity noted above, and within annual fisheries surveys for scallops.

- Further, reference to 4.2.4.13 (Shellfish Assemblages) do not include those within Manx waters, which are also surveyed by Bangor University. The connectivities between scallop fishing grounds in relation to recruitments processes should be more specifically acknowledged and the data set more comprehensive to reflect these connections, particularly when data originates from the same source. The TSC could facilitate a request for the most up to date reports to be shared from Bangor University.

- **Section 4.2.4.17** and **Table 4.7**: There is no reference or apparent consideration of shelfish in relation to spawning and nursery grounds. See also previous comments about connectivity between eg. scallop grounds.

- Also please note the statutory herring spawning closure in Manx waters in relation to sections **4.2.4.19 – 21**. This was originally included within EU Council Regulations (EC) No 850/98 (amended by EC 2723/1999, and has since been rescinded. However, the closure remains in place within Manx law : https://www.gov.im/media/1364592/sea-fisheriestechnicalmeasuresbye-laws2000_7.pdf (byelaw 18).

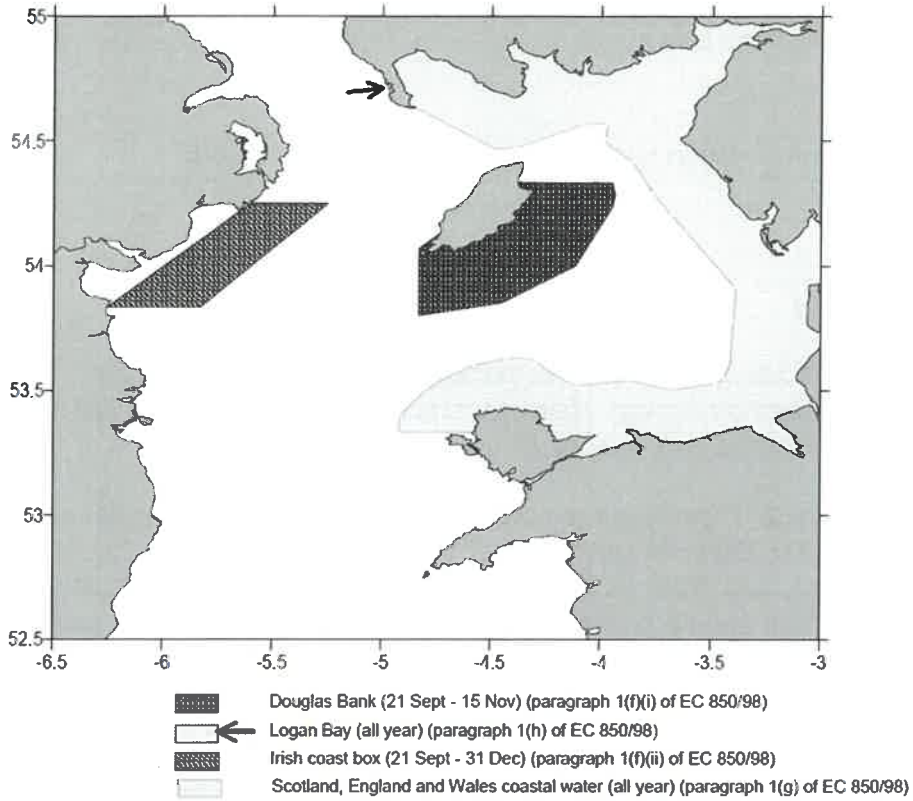

Figure 11.2.3 Position and geographical area of herring closures within the Irish Sea as defined by Council Regulation (EC) No 850/98, amended by EC 2723/1999.

4.2.4.22 Designated Sites

- See Douglas Bank herring closure (above).

- The current statutory commercial fishing closures for Manx waters can be found here, including annual closed areas, implemented via licence conditions; https://www.gov.im/categories/business-and-industries/commercial-fishing/iom-licencing/iom-conditions-and-variations/

- **Section 4.2.4.25** and **Table 4.8** should also take into account scallop and queen scallop in this context, as they are specifically protected within the majority of MNRs (See byelaw 8(1)(m): https://www.gov.im/media/1362727/manx-marine-nature-reserves-byelaws-2018-sd-2018-0186-300920.pdf

- **Table 4.8** takes into account all MNRs around the Manx coast. However, as noted above, the Committee recommends that this, and other defined project 'study areas', should encompass the jurisdictional boundaries of the Isle of Man, unless specifically considered not to be relevant.

- As noted elsewhere, it appears inconsistent to have included MNRs within the Fish and Shellfish Ecology section, but not within the Benthic Subtidal and Intertidal Ecology Assessment.

- With respect to **Table 4.9** (Relevant protected fish and shellfish species) and acknowledging the jurisdictional boundaries of the developments site, but also the migratory nature of some species, it may be relevant to note that several of these species are also protected under the Isle of Man Wildlife Act 1990. The relevance in this section

- is for the developer to determine, or perhaps comprehensively consider under transboundary effects, which **Section 4.2.10** appears to indicate that it will be?

- **Table 4.11** Noting the scoping out of 'Underwater Noise from wind turbine operation during operation and maintenance phase'. While the rationale is noted and broadly accepted, there is significant reference to lack of, or limited data in this field. The Isle of Man Government therefore recommends that opportunities by Developers to undertake monitoring and publication of data may help advance the understanding and consideration of this topic in future.

- **The comments noted above are also considered relevant in relation to Part 3: Transmission assets**

4.3 Marine Mammals

- Noting that **Section 4.3.2.4** 'The Mona regional marine mammal study area for the generation assets extends over the Irish Sea geographic region', including the Manx territorial sea.

- Migratory mammal species using Manx waters, and that may be affected by marine developments and activities, include Risso dolphins, bottlenose dolphins, harbour porpoise, the short-beaked common dolphin and Minke whales. Grey and harbour seals are regularly present in Manx waters and there is a large pupping colony on the Calf of Man as well as other smaller coastal sites aorund the Island. The Manx Whale and Dolphin Watch conduct research and collate a public-sightings programme on Manx cetaceans and the Manx Wildlife Trust also collates data on marine mammals and marine strandings. The responsible Departments of the Isle of Man Government are committed to the protection of these species in Manx waters, via domestic legislation and various international treaties to which the Island is a signatory.

- **Table 4.12** does not appear to have considered Isle of Man specific data sources, inlcuding historica datasets, some of which may be relevant;

- For information on Isle of Man marine mammals see the relevant chapters of the Manx Marine Environmental Assessment 3.4a[5] and 3.4b[6].

- Noting reference to these organisations, but limited specific inclusion of data, The Committee recommends contacting the Manx Wildlife Trust (MWT)[7](seals) and Manx Whale and Dolphin Watch (MWDW[8])(cetaceans) for further input on this question, and access to local data sources to better represent the situation for the Isle of Man.

For marine mammals, species management units (MU) define the spatial extent over which effects are considered.

Management Units for cetaceans in UK waters (January 2015) JNCC are:

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[5] https://www.gov.im/media/1363399/ch-34a-cetaceans.pdf
[6] https://www.gov.im/media/1363400/ch-34b-seals.pdf
[7] MWT Phone: 01624 844432 Email: enquiries@manxwt.org.uk
[8] MWDW Office: 01624 610 131, Email: info@mwdw.net

- Harbour Porpoise: 3. Celtic and Irish Seas (CIS) (comprising ICES area VI and VII, except VIId);
- Common dolphin Celtic and greater north sea;
- Bottlenose dolphin 6. Irish Sea (IS) (ICES Division VIIa);
- Risso's dolphin All UK waters (which by omission should also include the Manx Territorial sea; and,
- Minke Whale: single European waters management unit.

The Committee notes that the **Management Units for these cetaceans include Isle of Man territorial waters** and, as such, consider it appropriate that this area is included within the assessment for these species.

- **4.3.4.9** Minke whale: noting the comment '*This species is rarely recorded east of the Isle of Man and are rare in Liverpool Bay (Dong Energy, 2013).*' This statement is not accurate, as numerous annual records of the east coast of the Isle of Man confirm otherwise. While they may be most frequently recorded relatively close inshore, this cannot be assumed to be the scope of their distribution, and may represent land-based observer bias.

- Sightings data from Manx Whale and Dolphin Watch indicates that the species is particularly found between September and November off the east coast, and the statement (**Section 4.3.4.11**) that '*Minke whale are not regularly recorded around the Isle of Man by the Manx whale and dolphin watch.....* ' is not considered to be an accurate interpretation.

- Data provided by MWDW to the Department of Environment Food and Agriculture indicated that in 2021 Minke whales accounted for 8.2% of all public sightings recorded and included 31 reports of 42 individuals, including 3 juveniles. This in addition to 4 individuals recorded during land-based surveys.

- Acknowledging the general accuracy of the second part of the statement, that; '..... *individuals were recorded in November, October and September 2021* (Manx whale and dolphin watch, 2022).', the Committee reiterates its advice to contact this organisation again for clarification and interpretation of relevant data.

- Similarly, the data presented for Risso's dolphins appears at odds with the data available to the Isle of Man Government. Noting the comment; '*Risso's dolphin are not regularly recorded around the Isle of Man by the Manx whale and dolphin watch however individuals were recorded in September 2021 (Manx whale and dolphin watch, 2022).*' The same organisation reported 52 public sightings relating to 286 individual animals, including 25 juveniles, and accounting for 13.8% of all cetacean sightings records.

- While noting the intention to scope this species into the EIA, the Committee reiterates its advice to contact this organisation again for clarification and interpretation of relevant Manx data.

- Given the issues identified with this section, the Committee recommends a more comprehensive reconsideration of its presentation following further engagement with the MWDW.

4.3.4.37 Grey seals.

- In relation to **Section 4.3.4.40**, the statement that '*Grey seal at-sea distribution maps have been produced by Carter et al. (2020) based on a Global Positioning System (GPS) telemetry tagging programme by The Department for Business, Energy and Industrial*

Strategy (BEIS), through their Offshore Energy Strategic Environmental Assessment (OESEA) programme. ***This data shows that grey seal do not occur in high densities within the Mona regional marine mammal study area for the generation assets. Densities are higher*** *around the coasts and around the River Dee Estuary, the River Mersey Estuary,* ***and the southern tip of the Isle of Man*** *(Figure 4.18; Russell et al., 2017; Carter et al., 2020).'*

- This is not considered to be a comprehensive interpretation.

- Accepting that densities are higher in some areas, the Manx Wildlife Trust in its two 2020 whole-island seal counts reported 279 and 287 grey seals respectively, with historical monthly counts recording between 135 and 405 individuals. The Irish Sea population has been estimated to consist of between 5,198 – 6,976 individuals (Kiely *et al.,* 2000).

- For recent and historical data on grey seals in Manx waters, in addition the MMEA chapter, please contact Manx Wildlife Trust (see details above).

- **Table 4.13 (Summary of designated sites with relevant marine mammal features)** Please note that significant numbers of grey seals occur within Calf of Man and Wart Bank MNR, and are also a designation feature of that site.

Protected species

- **Section 4.3.4.56 (Table 4.14)** '*Relevant protected marine mammal species which have the potential to occur within the Mona benthic subtidal and intertidal ecology study area for the generation assets*'. Should this title actually refer to within 'Mona regional marine mammal study area for the generation assets'?

- The protective legislation referred to in Table 4.14 does not include the Isle of Man Wildlife Act 1990.

4.3.10 Transboundary effects. The TSC would like to confirm the Isle of Man's relevance for consideration of protected species within this issue.

- **Manx Marine Nature Reserves (MNRs)**; as acknowledged in Table 4.13 and Figure 4.20, several Manx MNRs specifically include cetaceans in their designation features, including presumed feeding grounds for Cardigan Bay Bottlenose Dolphins, regionally-important populations of Risso's dolphins and wide-ranging populations of grey seals.

- The Manx MNRs are available on OSPAR, JNCC, Protected Planet (United Nations Environment World Conservation Monitoring Centre) mapping tools.

- As noted, the Committee recommends contacting the Manx Wildlife Trust (MWT)[9](seals) and Manx Whale and Dolphin Watch (MWDW[10])(cetaceans) for further input on this question, and access to local data sources.

- **The comments noted above are also considered relevant in relation to Part 3: Transmission assets**

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[9] MWT Phone: 01624 844432 Email: enquiries@manxwt.org.uk

[10] MWDW Office: 01624 610 131, Email: info@mwdw.net

Section 4.4 Ornithology

Bird populations

We note that Manx shearwater, guillemot, razorbill and kittiwake are noted as numerous in previous surveys of the generation assets study area. These are all within foraging range of their Isle of Man breeding colonies.

Recent Manx BirdLife data shows that populations on the Isle of Man exceed 1% of the UK or British Isles breeding seabird populations for herring gull, little tern, shag and cormorant, and for wintering populations of shag, herring gull, great black-backed gull and black throated diver. In addition they exceed the 0.5% levels for breeding great black-backed gull, black guillemot and wintering cormorant. We also have healthy populations of many raptor species, some of which migrate across the Irish Sea. The conservation of these populations is important to us.

The Committee recommends the inclusion of bird data from Manx Birdlife (and the inclusion of non-marine, migratory or nomadic species, in particular birds of prey, which are recognised as being vulnerable to OWF collisions. Manx BirdLife holds the national database for bird data.

The TSC would request that the national bird statuses and conservation concerns of the Isle of Man are taken into account by reference to the recently published Manx Birds of Conservation Concern and we have a current concern regarding severe declines in many seabird populations on the Isle of Man (See http://manxbirdlife.im/seabirdcensus2017-18/). Schedule 1 of the Wildlife Act 1990 lists our specially protected birds. Both of these are relevant to the status of these species in the vicinity of this development and in particular, the considerations of potential impacts on Manx populations.

Of particular note is the seabird recovery project on the Calf of Man, under which Manx shearwater numbers are recovering and increasing, year on year, so it is important that the most up to date data are received from Manx National Heritage, the landowner, at the time of analysis. Annual updates are recommended if rerunning them.

Our national interest lies in maintaining our national bird populations and so consideration of the effects on the IoM population levels and on key breeding colonies are requested and considered most appropriate to Isle of Man consultation, as these are the scales which are relevant to us.

Transboundary impacts

The TSC welcomes the scoping in of transboundary impacts on ornithology. Despite being outside UK territorial waters, Manx bird populations may be utilising this area, which lies within the foraging ranges of many seabird species.

Designated sites (Section 4.4.4.9 onwards)

Noting the inclusion of MNRs and the island's RAMSAR site within this section, the Committee draws your attention to the Calf of Man status as a National Bird Observatory (designated in 1959) and a member of the Bird Observatories Council of Britain and Ireland.

The IoM does not have the designation of SPAs (though it is included within the Bern and Bonn Conventions), so it is important that in considering any impacts on key seabird breeding sites, that the full Seabirds Count surveys for the IoM are taken into account (Manx BirdLife have published a report for the IoM http://manxbirdlife.im/seabirdcensus2017-18/), as well as Areas of Special Scientific Interest. Please note that the Sugar Loaf and Calf of Man are not currently designated ASSIs, though these hold some of our largest seabird colonies and are listed as Important Bird Areas and potential Ramsar sites. The Calf is protected under the Manx Museum and National Trust Act. Both, however, are linked to MNRs with seabird features.

The Isle of Man is also a UNESCO Biosphere, which uniquely covers the whole of its terrestrial and marine territory.

Future consultations
We note the likely interest for the following NGOs: Manx Wildlife Trust, Manx BirdLife, Manx Ornithological Society.

Section 4.4.4.9 *Designated sites*

Noting the inclusion of MNRs and the Island's RAMSAR site within this section, the TSC would draw attention to the Calf of Man status as a National Bird Observatory (designated in 1959) and a member of the Bird Observatories Council of Britain and Ireland.

5 Offshore Human Environment
5.1 Commercial fisheries

The Isle of Man has regionally and economically-important fishery stocks within its territorial sea and works closely and effectively with the UK and devolved Governments in relation to shared access and sustainable fisheries management, including with the MMO, and this cooperative approach is expected to continue.

Further details on the island's fisheries and its fisheries development strategy can be found here;

- in the Manx Marine Environmental Assessment[11] (https://www.gov.im/media/1363405/ch-41-fisheries.pdf)

- https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/fisheries-division/future-fisheries-strategy/

The responsible Departments of the Isle of Man Government adopt a science-informed, ecosystem-based strategy, and is supportive of similar approaches. Various marine development activities surrounding the Isle of Man have the potential to adversely affect economically-important fisheries within Manx waters, and this is particularly relevant in relation to trans-boundary stocks, or to reproductive connectivities between stocks in different jurisdictional areas. Examples of relevant species in this regard include; herring, scallop and queen scallop, whelk and *Nephrops* (langoustine).

Various fisheries stock assessments are carried out in Manx, and in UK waters, by both Manx-based and UK research organisations (e.g. Bangor University, AFBI), frequently using the same annual stations[12]. It is recommended that impact assessments and associated fisheries liasions officers contact these organisations for further details. The Committee is supportive of collaborative research and cooperation in relation to fisheries science and management.

Temporal and spatial fisheries closed areas are also present in Manx waters, and their positions may vary depending on annual stock assessment surveys. The latest versions may be found on the DEFA fisheries website[13] (under commercial fishing licence conditions), but may change from year to year.

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[11] https://www.gov.im/media/1363405/ch-41-fisheries.pdf

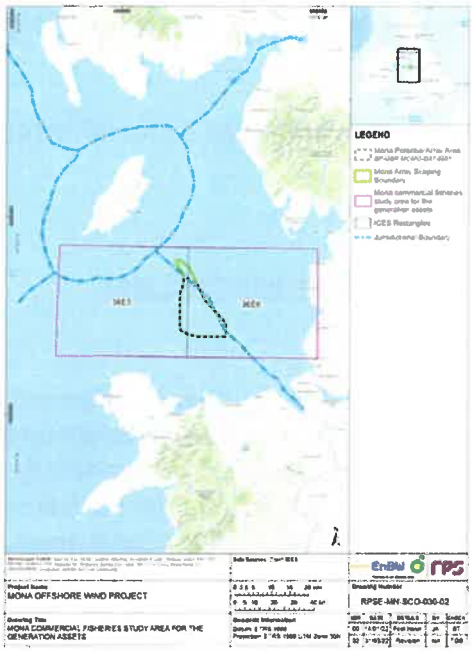
[12] http://fisheries-conservation.bangor.ac.uk/iom/documents/IOM_QSC_SAReport_2019_final.pdf

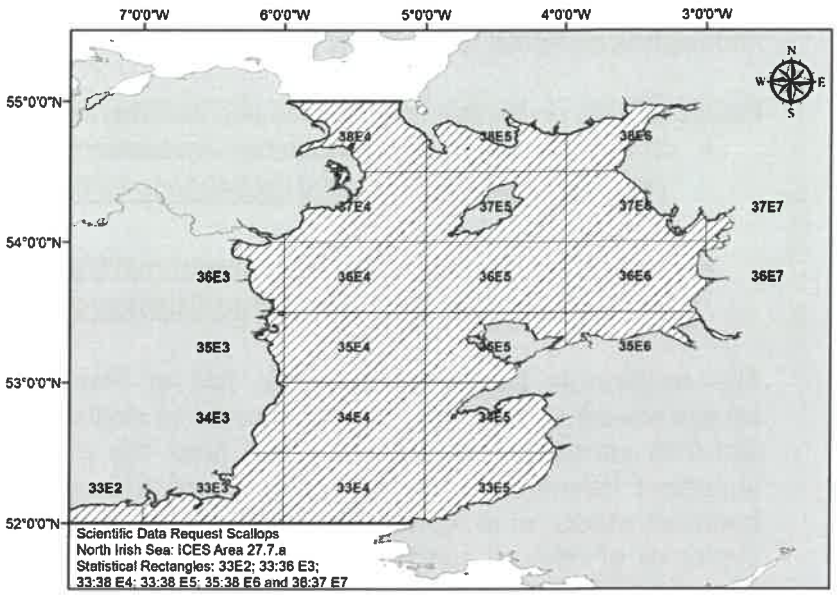
[13] https://www.gov.im/media/1367938/iomfl-schedule-h10-020120.pdf

5.1.2 Study area

- The TSC notes that ICES rectangle 36E5 is partially within Manx territorial waters, and so the assessment is expected to include appropriate consideration of Manx fisheries interests.
- **However, noting the intention to include only ICES statistical rectangles** 36E5 and 36E6 in the 'Mona commercial fisheries study area', the Committee considers this to be inadequate in scope as it will not sufficiently take into account potential vessel displacement effects, or stocks that have a wider ecological scope, or connectivities between commercial species ground eg. in relation to source and sinks for larval recruitment, different life stages (eg. spawning and larval distribution and settlement areas.

- The committee recommends a wider scope for commercial fishing interests is considered and consulted upon, potentially including the rectangles to the north and south ie. 37 E5 and 37 E6, 35 E5 and 35 E6, with others potentially added following consultation (see Figure).





- Noting at **Section 5.1.3.3**, the comment that '*smaller vessels are excluded from Vessel Monitoring Systems (VMS) data, as only vessels with a length of ≥15m (MMO) or >12m (ICES) are captured.*'

- This is not correct for scallop vessels fishing within Manx waters 36E5, or throughout the territorial sea area, since all such vessels must possess and operate a VMS device during fishing activities, regardless of size.

- It is unclear to what extent attempts have been made to include, or otherwise account for <15m static and mobile sectors operating within and around 36 E5 and 36 E6. As such the section does not provide sufficient data for an accurate baseline of all fisheries sectors, including estimates of commercial value

- Overall, the Committee considers that **the use of only two ICES statistical rectangles and only ≥15m vessel VMS data to describe and illustrate the extent of commercial fisheries interest in the area is inadequate** and should be significantly improved upon for the full assessment process.

- The committee recommends further engagement with relevant commercial fisheries, science and fisheries management organisations within the region, including Bangor University, which undertakes stock surveys and assessments and publishes relevant fisheries science material online.

- In addition, AFBI NI also undertake annual surveys for scallops, queen scallops and herring survey data within the scope of the project area.

- Noting **Sections 5.1.3.4 and 5.1.6.1**, the Committee recommends full and continued inclusion of the Manx Fish Producers' Association (MFPO) as a relevant stakeholder via the FLO.

- **The comments noted above are also considered relevant in relation to Part 3: Transmission assets.**

Section 5.2 Shipping and Navigation

The TSC welcomes the inclusion of the Island's shipping routes as part of this assessment, and further supports the continued involvement of the Isle of Man Steam Packet Company as part of the Maritime Navigation Engagement Forum.

As previously advised, the TSC would welcome the inclusion of the site of an Agreement for Lease with Ørsted to develop an offshore windfarm in Manx territorial waters particularly in Drawing Number RPSE-MN-SCO-023-01, p170/272. It might also be useful to include the distances to both this proposed offshore windfarm site, and the hydrocarbon site within Tables 5.6 and 5.7, the distances from Mona for both are 32.8km / 17.7nm and 41.8km / 22.6nm respectively.

The TSC notes the inclusion of Isle of Man Steam Packet Company routes as part of both the commercial shipping and the ferry routes identified by means of the VMS in Figure RPSE_MN_SCO_024-02. Of particular note is the Douglas Liverpool route which transects the Mona scoping boundary and both the study area for generation and transmission assets whilst the Douglas Liverpool weather route in very close proximity to the SW corner of the proposed Mona boundary) and again features as a route in all study areas. The TSC welcomes the involvement of the IOMSPC in continued discussions. It further welcomes the routes as being scoped in as part of the EIA for further consideration as part of this project and would specifically wish to see these routes included in the assessment of cumulative impacts, particularly as set out in para 5.2.8 (p196/414). This should also include the assessment against the Agreement for Lease site in Manx waters for an offshore windfarm, and the hydrocarbons exploration site. All of these projects have the potential to make shipping and navigation in Manx waters more problematic than it is currently, and could result in not only impacts on the route, but also monetary and time costs to all those using these lifeline services.

The TSC further acknowledges the lower densities in respect of tug and service vessels to and from the Isle of Man compared to some of the other ports, however, it should be noted that the Isle of Man, and Douglas Harbour northwards plays a vital role in the Irish Sea during times of rough weather, providing a safe shelter for many vessels. The opportunity for ships to easily access must be maintained and considered as part of this assessment.

Any significant risk of interference with navigation is of concern to the TSC as the island is heavily reliant on a high quality marine transport system for goods, services and passengers.

With regards to the cumulative impacts in para 5.2.8.2 (Part 2 Generation assets), the TSC would welcome the inclusion of both the proposed offshore windfarm site and hydrocarbon block 112/25 within any assessment and would be keen to see the outcome of this assessment. There is the potential for significant on the Island's shipping routes with all the proposed offshore windfarms, and the TSC must ensure that any disruptions to services are minimal so as not to be to the detriment of the Island's quality of life.

In respect of 5.2.10.1 (Part 2 Generation assets), the TSC seeks confirmation that there will be no requirement for deviation to the Island's shipping routes as this is not included for consideration as part of transboundary issues. This is particularly of importance given that the Isle of Man Steam Packet Company's Douglas – Heysham weather route traverses the northern tip of the proposed Mona site, so confirmation that no impact on this route as a result of this windfarm would be most helpful.

Search and Rescue

The TSC wishes to ensure that the position of the Isle of Man in respect of Search and Rescue (SAR) is fully understood. The UK's MCA understakes the Island's SAR on our behalf via an MOU between the MCA and the Department of Infrastructure. This MOU covers both SAR and marine pollution events. It is essential that this is acknowleged as part of the consideration of SAR both to ensure the dispatch of any required vessels boats and helicopters (via RNLI and HMCG) are not impeded in emergencys. HMCG oversee emergency calls, and will dispatch the relevant vessels – the Island's lifeboat stations will deploy first.

Section 6.3 Aviation

The TSC welcomes the inclusion of the Primary Radar Surveillance at Ronaldsway being taken into account as part of this development to ensure there will be no detrimental impact to the radar from the proposed development and operation of the turbines. The airport is fundamental to the Island community.

Specific comments from Ronaldsway Air Traffic Services in respect of the Ronaldsway Primary Radar are that at 20nm range from Radar, any returns from the nearest wind turbine should be minimal, any that are received should be capable of suppressing by the radar signal processing systems. May require assistance from Leonardo (Selex) to set up any radar processing requirements.

Any primary returns from the proposed Mona offshore wind turbines would be similar in strength to returns currently received from east of Isle of Man wind turbines at approximately same range, which are minimal.

In respect of the Ronaldsway Secondary Radar (MLAT), it is not expect to have any detrimental effects from the proposed Mona offshore wind turbines.

Manx Cable Company interconnector

The Manx Cable Company (MCC) own and operates, on behalf of the Manx Utilities Authority, a submarine power cable, referred to as the interconnector, which runs between Douglas Head in the Isle of Man and Bispham, Blackpool. With an undersea section of approximately 104km (65 mi), it is one the longest AC undersea cables in the world and is an essential means of maintaining secure supplies of electricity to the residents of the Isle of Man.

Sub-sea cables are vulnerable to third-party damage from mobile fishing activities and the risks from fishing vessels and their activities are constantly being monitored and assessed, as the impact from third-party damage can result in significant repair and business interruption costs to the Authority.

With this in mind and considering the interconnector's asset value and strategic importance to our business and the wider Manx economy the MCC welcomes the opportunity to engage in the consultation process.

Interpretation of Wind Farm Proximity to the Interconnector

The proposed wind farm is sited south of the interconnector with the closest point between the wind farm, northern boundary, and the interconnector of approximately 14km.

The wind farm export cables will be positioned within the indicative cable corridor proposed, which runs predominately from the southern boundary towards the north coast of Wales, terminating at a potential onshore grid connection to National Grid infrastructure.

Comments and Feedback:

Item	Risk Category	Potential Increase in Risk	Level of Concern	Comments
1	Third Party Damage	Vessels engaged in the construction and maintenance utilise Douglas Harbour increasing the potential for vessels anchoring in the vicinity of Douglas Bay.	Medium	Request Mona Array ensures robust protocols are in place to highlight the existence and positioning of the interconnector to all vessel engaged in the supply chain.
2	Third Party Damage	Displacement of fishing activity increases fishing interaction, from present levels, over the able route.	Low	The impact of displaced fishing activity may present an unacceptable increase in risk considering the collective impact of Eastern Irish Sea in the future.

In addition to the above, and for the purpose of transparency, it is appropriate to share an outline of Manx Utilities plans relating to a second interconnector for the Isle of Man.

Several options for future interconnection, via a second sub-sea interconnector cable, are currently being considered with one potential off-shore cable route/corridor running to the north of the proposed Mona Array.

At present these plans and options are still in the high level feasibility stage but it is considered appropriate to highlight and share our plans for information purposes at this stage. It would be appropriate for the applicant to liaise directly with the Manx Cable Company to understand the plans for the proposed interconnector at their earliest convenience.

The above should not be seen as negative feedback and can be considered as a first step in working towards reducing potential conflict in the future.

Manx Marine Accreditations

The Isle of Man is signatory, via the UK, to the UN Convention on Biological Diversity, OSPAR Convention, the Convention on Migratory Species, ASCOBANS and several other international conservation conventions.

"The Manx Marine Environmental Assessment" provides a comprehensive source of information on the Manx marine environment with reference to baseline data that may be useful fo consider in relation to future work.
https://www.gov.im/about-the-government/departments/infrastructure/harbours-information/territorial-seas/manx-marine-environmental-assessment/

It may also be of particular interest to note that the whole of the Isle of Man and its territorial waters has been designated as a biosphere reserve; UNESCO Biosphere Isle of Man (https://www.biosphere.im/), within which the network of Marine Nature Reserves constitute the marine core areas. The TSC therefore requests your support in seeking to ensure the future environmental sustainability of this unique area.

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JNCC Reference: OIA-08713
Ref: EN010137-000008
Date: 1 June 2022

Dear Hannah,

Mona Offshore Wind Project Environmental Impact Assessment Scoping Report (Ref. EN010137-000008)

Thank you for consulting JNCC on the Mona Offshore Wind Limited, Mona Offshore Wind Project Environmental Impact Assessment (EIA) Scoping Report, dated May 2022, which we received on 6 May 2022.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by NRW for aspects relating to inshore waters.

The documents reviewed are;

- Mona Offshore Wind Project EIA Scoping Report:
  - Part 1 – Introduction (dated April 2022)
  - Part 2 – Generation assets (dated April 2022)
  - Part 3 – Transmission assets (dated April 2022)
  - Part 4 – Annexes (dated May 2022)

The advice below relates to:

- **Marine Ornithology**
- **Marine Mammals**
- **Physical Processes**
- **Benthic Ecology**

Please note that the responses below apply to both Part 2: Generation assets and Part 3: Transmission assets.

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

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Marine Ornithology Comments

General Comments

This is a well thought-out scoping report which has taken account of SNCB advice.

Part 2: Generation assets & Part 3: Transmission assets, 4.4.3.6: In addition to generating density and abundance estimates for frequently recorded seabird species, we would advise that a log of all species encountered in aerial surveys is provided.

Response to questions

1. ***Are there any additional baseline data sources available that could be used to inform the EIA?***

   To help assign birds seen at footprint to colony-of-origin, and potentially additional parameters or contextual evidence, it may be worth reviewing available and relevant tracking data, for instance Manx shearwater tracking at Skomer and the Copeland Islands, northern gannet at Grassholm, black-legged kittiwake at Rockabill, and guillemot at Isle of Canna as a few examples.

2. ***Does the reader agree that the proposed study areas are appropriate for each of the EIA topics?***

   Note that joint SNCB guidance regarding the assessment of displacement of red-throated diver has recently been updated. We recommend that displacement out to at least 10km from the proposed wind farm boundary is assessed for red-throated diver (SNCBs, 2022).

3. ***Have all potential impacts resulting from the Mona Offshore Wind Project generation and transmission assets been identified for each of the EIA topics within this EIA Scoping Report?***

   Displacement and barrier effects to seabirds occurring during O&M should also be assumed to occur during both construction and decommissioning. Table 4.19 indicates that displacement will be considered during construction and decommissioning phases, but not barrier effects. In the absence of evidence to the contrary, then an assumption of a mean annual mortality of 50% of that assessed during O&M should be applied to construction and to decommissioning phases.

4. ***Does the reader agree with the impacts to be scoped in, and out, of the assessment?***

   Displacement and barrier effects to seabirds occurring during O&M should also be assumed to occur during both construction and decommissioning. Table 4.19 indicates that displacement will be considered during construction and decommissioning phases, but not barrier effects. In the absence of evidence to the contrary, then an assumption of a mean annual mortality of 50% of that assessed during O&M should be applied to construction and to decommissioning phases.

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

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5. ***For those impacts scoped in, does the reader agree that the methods described are sufficient to inform a robust impact assessment?***

   We agree with the use of Woodward et al 2019 and Furness 2015 to identify breeding and non-breeding seabird populations potentially affected by this project, respectively, and agree with the intention to use mean maximum plus one standard deviation to establish connectivity to breeding sites.

   Please clarify the rationale for surveying at an altitude of 396m and provide evidence that disturbance to sensitive seabird species would not occur at this altitude.

6. ***Are there any specific developments or infrastructure schemes which should be taken into account when considering potential cumulative impacts?***

   Clarity is required as to how impacts from operational developments will be included within a cumulative assessment. If built and operational projects are classed as part of the baseline conditions, then the project alone assessment needs to consider whether it brings 'baseline mortality' (including the mortality contributed from baseline projects) above a level that is unacceptable. Mortality that can be attributed to projects that were built and operational at the time that survey data were collected do need to be considered alongside predicted mortality from the Mona proposal. We would suggest that, given the difficulties in assessing 'actual' mortality or population consequences for mobile species such as marine birds, from existing built and operational infrastructure (such as windfarms), then in practice this means that the assessment is based on a combined 'predicted' mortality across built, operational, under construction, consented and otherwise identified infrastructure projects. This is the premise behind a Cumulative Effects Framework tool being produced by a consortium led by CEH, and supported by the SNCBs, which should help to implement a meaningful cumulative effects assessment. https://www.ceh.ac.uk/our-science/projects/cumulative-effects-framework-key-ecological-receptors

   Figure 4.3 appears to suggest that operational project/plans will be included within a cumulative assessment, which contracts with the list of developments in section 4.8.2.1. Please clarify whether and how the impact operational developments will be incorporated in a cumulative assessment.

References

SNCBs (2022) "Joint SNCB Interim Advice On The Treatment Of Displacement For Red-Throated Diver (2022)" https://hub.jncc.gov.uk/assets/9aecb87c-80c5-4cfb-9102-39f0228dcc9a#:~:text=The%20Joint%20SNCB%20Interim%20Displacement,England%20and%20JNCC%20in%202012

Marine Mammal Comments

General Comments

We found the scoping report was thorough and generally appropriately detailed. JNCC are part of the marine mammal expert working group (EWG) and look forward to discussing the specifics of the impact assessment further as part of this group.

Response to questions

1. ***Are there any additional baseline data sources available that could be used to inform the EIA?***

   We are satisfied with the data sources listed in Part 2: Generation assets, Table 3.1 for marine mammals, and the equivalent table in Part 3, and have no further additions to add. We provide the following additional comments for consideration:

   Part 1: Introduction, 3.4.4.2 Seabed preparation

   - This paragraph describes the potential to find unexploded ordnance (UXO) within the development area and actions that could be taken. While we note the reference to deflagration later in the document, it would have been beneficial to refer to the position statement[1] on preferred methods of UXO clearance published by Defra and signed by the Regulators and SNCBs.

   Part 2: Generation assets, 4.3.3 Data sources

   - Table 4.12: we highlight that a new Welsh cetacean atlas is due for release soon, which should be considered once available.
   - Section 4.3.3.3: the survey method for site-specific surveys has been provided to the EWG, however, JNCC were not able to agree with the presented methodology due to a lack of receptor-specific evidence to support the approach taken for marine mammals.
   - Section 4.3.3.4: we look forward to discussing results of the site-specific surveys through the EWG.

   As much of the information for marine mammals provided in Part 3 is identical to that presented in Part 2, comments provided above for Part 2 apply to Part 3 as well.

2. ***Does the reader agree that the proposed study areas are appropriate for each of the EIA topics?***

   We are happy with the use of two different study scales, i.e. site specific and regional scale, however we advise the applicant should use published marine mammal management units[2] for the regional study area not the Irish Sea geographical area presented.

3. ***Have all potential impacts resulting from the Mona Offshore Wind Project generation and transmission assets been identified for each of the EIA topics within this EIA Scoping Report?***

[1] Marine environment: unexploded ordnance clearance joint interim position statement - GOV.UK (www.gov.uk)

[2] Updated abundance estimates for cetacean Management Units in UK waters | JNCC Resource Hub

JNCC agree that all potential impacts to marine mammals resulting from the Mona Offshore Wind Project generation assets have been identified for each of the EIA topics in this report listed in Part 2: Generation assets, Tables 4.15 and 4.16, and the equivalent tables in Part 3.

4. Does the reader agree with the impacts to be scoped in, and out, of the assessment?

JNCC largely agree with the impacts scoped in and of the assessment for marine mammals but note a number of comments and suggestions for each of the three parts of the scoping report, which should be applied before continuing.

Part 1: Introduction, Section 3.2 Underwater noise

- Tables 3.5 and 3.6: we agree with the potential impacts scoped in and out for the underwater noise assessment.
- Section 3.2.7.1: we highlight JNCC's plan to update the marine mammal mitigation guidelines in the near future, we recommend the developer check our web page[3] for updates prior developing mitigation plans.

Part 2: Generation assets, 4.3.5 Potential project impacts

- Table 4.15 and 4.16: we agree with the list of impact scoped into the assessment (Table 4.15) but question why operational noise has been scoped out (Table 4.16). The justification provided refers to a 2014 review undertaken by the MMO on monitoring data available at the time. However, turbine generators have increased in size since the release of this review and its unknown how this has affected the level of noise transmitting into the marine environment from operating turbines. We also note the behavioural evidence quoted to support this conclusion is of a similar age and will again be in response to smaller turbines than could be used here. We suggest that this impact is scoped in.

Part 3: Transmission assets, 3.2 Underwater noise

- Tables 3.6 and 3.7: we agree with the potential impacts scoped in and out for the underwater noise assessment.

Part 3: Transmission assets, 4.3 Marine mammals

- Tables 4.16 and 4.17: we agree with the list of impact scoped in and out of the impact assessment.

5. For those impacts scoped in, does the reader agree that the methods described are sufficient to inform a robust impact assessment?

JNCC have noted a number of comments and suggested changes for the assessment methodology sections for marine mammals. We assume the proposed methodologies will be discussed in more detail as part of the EWG and look forward to those discussions.

Part 1: Introduction, Section 3.2 Underwater noise

[3] Marine mammals and noise mitigation | JNCC - Adviser to Government on Nature Conservation

- Section 3.2.7.4: we agree the use of both realistic and max design scenarios when assessing potential impacts from noise is beneficial.
- Table 3.7: we are content with the swim speeds presented. While faster swim speeds for some species have been published, e.g. harbour porpoise, we believe a precautionary 1.5m/s for harbour porpoise and dolphin species allows for individual differences in response to noise.

Part 2: Generation assets, 4.3 Marine Mammals

- Section 4.3.2.3: this states site surveys will underpin quantitative assessments on marine mammals however data from these surveys is still to be analysed. Based on experience of surveys at other sites, we highlight it may not be possible to estimate densities for all key species from these surveys.
- Section 4.3.2.4: as noted above, we are happy with the use of two different study scales, i.e. site specific and regional scale, however we advise the applicant should use published marine mammal management units[4] for the regional study area not the Irish Sea geographical area presented.

Part 2: Generation assets, 4.3.4 Baseline environment

- Section 4.3.4: we agree that harbour porpoise, minke whale, bottlenose dolphin, common dolphin, Risso's dolphin, & grey seal are scoped into the EIA; and white-beaked dolphin and harbour seal are scoped out.
- Section 4.3.4.4: we note reference to the Joint Cetacean Protocol (JCP) and highlight this has now been superseded by the Joint Cetacean Data Programme (JCDP). This programme, funded by Defra and managed by JNCC, aims to promote, and facilitate cetacean data standardisation, maximise the value of data collected and enable universal access. We request the applicant review their site-specific survey data for compatibility and submit data to this programme.
- Table 4.14: we question why this includes harbour seal when it is proposed they are scoped out of the impact assessment.

Part 2: Generation assets, 4.3.7 Proposed assessment methodology

- Section 4.3.7.1: we again highlight JNCC plan to update their marine mammal mitigation guidelines.
- Section 4.3.7.2: we agree with the proposed methodology for assessing potential impacts to marine mammals from underwater noise and assessing the risk of injury using both peak SPL and cumulative SEL metrics. Regarding disturbance, we agree with using what is considered best practice at the time, including potentially the use of species-specific dose response curves and look forward to discussing this further as part of the EWG. We highlight that currently JNCC require the use of effective deterrent ranges[5] (EDRs) when assessing potential disturbance to the North Anglesey Marine SAC.
- Section 4.3.7.3: we look forward to discussing species-specific densities to be used in the impact assessment as part of the EWG. We again highlight that it

[4] Updated abundance estimates for cetacean Management Units in UK waters | JNCC Resource Hub

[5] Guidance on noise management in harbour porpoise SACs | JNCC Resource Hub

may not be possible to estimate site-based densities for all key marine mammal species from the aerial surveys therefore alternatives will need to be agreed.

- Section 4.3.7.4: The applicant proposes to group marine mammals into broad ecological receptor groups, referred to as Important Ecological Features. However, this doesn't explain how marine mammal receptors will be grouped. We question whether this will be discussed in the EWG?

Part 2: Generation assets, 4.3.8 Potential cumulative effects

- Section 4.3.8: we agree with the approach proposed and inclusion of the activities noted.

Part 3: Transmission assets, 4.3 Marine mammals

- Section 4.3.4: we agree that harbour porpoise, minke whale, bottlenose dolphin, common dolphin, Risso's dolphin, & grey seal are scoped into the EIA; and white-beaked dolphin and harbour seal are scoped out.
- Table 4.14: we note the North Anglesey Marine SAC is listed as being 7.4km from the offshore transmission search area. One concern for this site is injury and disturbance of harbour porpoise from underwater noise, with piling of the OSP and substation foundations being one of the loudest noise sources. However, we assume in practice these will be close to or within the windfarm array area so further away from the site than quoted in this table. There is also the potential requirement to clear UXOs within the search area however we presume deflagration (or similar alternative) will be the preferred clearance method, which will reduce potential impacts to this site.
- Table 4.15: again, harbour seals are listed here despite the proposal to scope them out of the impact assessment.

Please note that as much of the information for marine mammals provided in Part 3 is identical to that presented in Part 2, comments listed above for Part 2 apply to Part 3 as well.

6. ***Are there any specific developments or infrastructure schemes which should be taken into account when considering potential cumulative impacts?***

   We do not have any developments to note at this time.

Physical Processes Comments

General Comments

JNCC appreciate the quality of the Mona EIA Scoping Report. Further comments below address the issues JNCC would like to raise.

Response to questions

1. ***Are there any additional baseline data sources available that could be used to inform the EIA?***

JNCC are content with what has been included and has nothing further to add.

2. ***Does the reader agree that the proposed study areas are appropriate for each of the EIA topics?***

   JNCC are of the opinion that the proposed study areas are appropriate for each of the EIA topics.

3. ***Have all potential impacts resulting from the Mona Offshore Wind Project generation and transmission assets been identified for each of the EIA topics within this EIA Scoping Report?***

   Part 1: 3.4.4 Seabed preparation

   JNCC note that seabed preparation may include seabed levelling. We would advise that modification of the seabed would result in temporary disturbance of the seabed and changes to patterns of sediment transport resulting in morphological change. We would also highlight that any disturbed sediment resulting from these activities should be retained within the same sediment system.

   Part 1: 3.4.7 Inter-array cables, 3.4.8 Interconnection cables, 3.4.9 Offshore export cables

   JNCC note that the inter-array, interconnector and offshore export cables will be buried wherever possible using methods such as ploughing, trenching or jetting. As with seabed levelling, any material disturbed through cable installation activities such as ploughing or trenching must be deposited at a location that enables it to remain within the same sediment system, for example depositing the disturbed sediment up stream of the trenches to encourage natural backfill.

4. ***Does the reader agree with the impacts to be scoped in, and out, of the assessment?***

   Overall JNCC agree with the potential impacts that will be scoped in and will require further assessment at the EIA stage. However, we would like to highlight that impacts on resulting from scour should be considered here.

5. ***For those impacts scoped in, does the reader agree that the methods described are sufficient to inform a robust impact assessment?***

   JNCC are of the opinion that, of those impacts that have been scoped in, the methods described are sufficient to inform a robust impact assessment.

6. ***Are there any specific developments or infrastructure schemes which should be taken into account when considering potential cumulative impacts?***

   JNCC would like to take this opportunity to highlight that with regard to Cumulative Effects Assessment, we are of the opinion that projects which are built and operational and have residual impacts would need to be considered in Cumulative Effects Assessment (CEA).

   Please clarify whether and how operational developments will be incorporated into a cumulative assessment.

Benthic Ecology Comments

General Comments

JNCC appreciate the quality of the Mona EIA Scoping Report. Further comments below address the issues JNCC would like to raise.

Response to questions

1. ***Are there any additional baseline data sources available that could be used to inform the EIA?***

   JNCC are content with what has been included and has nothing further to add.

2. ***Does the reader agree that the proposed study areas are appropriate for each of the EIA topics?***

   JNCC are of the opinion that the proposed study areas are appropriate for each of the EIA topics.

3. ***Have all potential impacts resulting from the Mona Offshore Wind Project generation and transmission assets been identified for each of the EIA topics within this EIA Scoping Report?***

   Part 1: 3.4.4 Seabed preparation

   JNCC note that seabed preparation may include seabed levelling and removal of boulders. We advise that modification of the seabed would result in temporary disturbance of the seabed and changes to patterns of sediment transport resulting in morphological change. We would like to highlight that any disturbed sediment resulting from these activities should be retained within the same sediment system. We would also request that any boulders removed from the seabed remain within the marine environment.

   Part 1: 3.4.5 Scour protection for foundations

   JNCC acknowledge that the amount of rock protection and scour protection are currently unknown but note that the application involves the introduction of hard substrate into a mainly sedimentary environment. We still encourage the operator to work to minimise the amount of hard substrate material used. We note that the long-term effect of the introduction of substratum into naturally sandy or muddy seabeds is not fully understood at present, and should be carefully considered.

   In conjunction with the information to be gathered on the proposed offshore array and export cable corridor through survey work, we highlight that it would be helpful to have details on the following technical aspects relating to the installation and operation of the Project:

   - Footprint of area affected by laying of the export cables;
   - Footprint of area affected by export cable protection;
   - Footprint of area affected by inter-array cables**;**

- Footprint of area affected by inter-array cable protection**;**
- Footprint of area affected by interconnector cables**;**
- Footprint of area affected by interconnector cable protection**;**
- Footprint of area affected by placement of foundations;
- Duration and rate of cable-laying;
- Number and types of vessels to be used in cable-laying operations;
- Routes of vessels for cable works.

Part 1: 3.4.7 Inter-array cables, 3.4.8 Interconnection cables, 3.4.9 Offshore export cables

JNCC note that the inter-array, interconnector and offshore export cables will be buried wherever possible using methods such as ploughing, trenching or jetting. As with seabed levelling, any material disturbed through cable installation activities such as ploughing or trenching must be deposited at a location that enables it to remain within the same sediment system, for example depositing the disturbed sediment up stream of the trenches to encourage natural backfill.

Part 2: 4.1.4.26 JNCC request further information be provided with regard to the assessments of the "sea-pen and burrowing mega communities" and "low resemblance to rocky reef" habitats and would like to highlight the following document which may prove useful.

Refining the criteria for defining areas with a 'low resemblance' to Annex I stony reef (JNCC Report No. 656)

4. ***Does the reader agree with the impacts to be scoped in, and out, of the assessment?***

JNCC are largely content with the impacts that have been scoped in and out of the assessment (as per Part 2: Table 4.4 and Table 4.5). However, we would ask that Habitat Alteration be scoped in. JNCC acknowledge that 'colonisation of hard structures' has been scoped in however, JNCC consider 'physical change to another sediment type' to be a pressure for the offshore wind operation phase and the introduction of hard substrate into naturally sandy or muddy seabeds has the potential to change or introduce new, alternative, biological communities. In addition, there is the potential for indirect impacts on surrounding habitats including the affects from scour and changes in hydrodynamics resulting from the introduction of hard substrate.
We would also advise the inclusion of the impact to adjacent habitats from the removal and deposition of marine growth from hard substrates which may potentially impact a larger area than the infrastructure footprint.

5. ***For those impacts scoped in, does the reader agree that the methods described are sufficient to inform a robust impact assessment?***

JNCC are of the opinion that, of those impacts that have been scoped in, the methods described are sufficient to inform a robust impact assessment.

6. ***Are there any specific developments or infrastructure schemes which should be taken into account when considering potential cumulative impacts?***

JNCC would like to take this opportunity to highlight that with regard to Cumulative Effects Assessment, we are of the opinion that projects which are built and operational and have residual impacts would need to be considered in Cumulative Effects Assessment (CEA).

Please clarify whether and how operational developments will be incorporated into a cumulative assessment.

Please contact me with any questions regarding the above comments.

Yours sincerely,

Jillian Whyte
Offshore Industries Adviser
Email: [redacted]@jncc.gov.uk
Telephone: [redacted]

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

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From: [redacted]
To: Mona Offshore Wind Project
Subject: EN010137 - Mona Offshore Wind Farm - EIA Scoping Notification and Consultation
Date: 27 May 2022 10:25:33

Dear Sir/Madam,

Your ref - EN010137-000009

Lancashire County Council do not have any comments to make at this stage.

Regards,
Richard

Richard Sharples
Principal Planner
Planning and Environment
Lancashire County Council
[redacted]@lancashire.gov.uk
[redacted]
www.lancashire.gov.uk

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Nick Salter
Maritime and Coastguard Agency
UK Technical Services – Navigation
105 Commercial Road
Southampton
SO15 1EG
www.gov.uk/mca

Your ref: EN010137-000008

30 May 2022

Hannah Terry
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Ms Terry

Application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

Scoping Report Consultation

Thank you for your letter dated 5 May 2022 requesting comments on the scoping report provided by Mona Offshore Wind Limited. The MCA welcomes the opportunity to provide comments under the above Environmental Impact Assessment Regulations, and we would comment as follows:

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk
- Navigational Safety
- Visual intrusion and noise
- Risk Management and Emergency response
- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions
- The likely squeeze of small craft into the routes of larger commercial vessels.

The development area carries a significant amount of through traffic with a number of shipping routes, particularly ferries, in close proximity. Attention needs to be paid to routing, particularly in heavy weather ensuring shipping can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects on shipping routes should be considered which will be an important issue to assess for this project. It should take into account the proximity to other windfarm developments, other infrastructure and the impact on safe navigable sea room.

It is noted that a Navigational Risk Assessment will be submitted in accordance with MGN 654. This should be accompanied by a detailed MGN 654 Checklist which can be found at:
https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping

We note that a vessel traffic survey will be undertaken to the standard of MGN 654. The survey will consist of a minimum of 28 days of seasonal data (two x 14-day surveys) collected from a vessel-

INVESTORS IN PEOPLE | Silver

based survey using AIS, radar and visual observations to capture all vessels navigating in the study area.

The proximity to other offshore windfarms will need to be fully considered, with an appropriate assessment of the distances between OREI boundaries and shipping routes as per MGN 654. The cumulative impacts of other windfarms in close proximity, in particular the proposed Morecambe and Morgan offshore wind farms, will change routing. Attention must be paid for ensuring the established shipping routes in the Irish sea, particularly ferry routes, can continue safely without unacceptable deviations.

The turbine layout design will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g. rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas. A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach.

Yours sincerely,

Nick Salter
Offshore Renewables Lead
UK Technical Services - Navigation

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Land and Acquisitions
Anne Holdsworth
DCO Liaison Officer
UK Land and Property
[redacted]@nationalgrid.com
Direct tel: [redacted]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
MonaOffshoreWindProject@planninginspectorate.gov.uk

19 May 2022

Dear Sir/Madam

APPLICATION BY MONA OFFSHORE WIND LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MONA OFFSHORE WIND FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULATION REPONSE

I refer to your letter dated 5th May 2022 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET infrastructure within or in close proximity to the current red line boundary.

Electricity Transmission Infrastructure

NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales.

Substation

- Bodelwyddan 400kV Sub Station
- Associated overhead and underground apparatus including cables

Overhead Lines

4ZB 400kV OHL -	Bodelwyddan - Deeside - Pentir 1
	Bodelwyddan - Deeside - Pentir 2
GM Route 400kV OHL	Bodelwyddan - Deeside - Pentir 2

Cable Apparatus

- Pentre-Mawr Cable Compound
- Deeside - Pentir 1 Cable
- Bodelwyddan4 St Asaph 132kv Cable Sections 01 And 02

National Grid is a trading name for:
National Grid Electricity Transmission plc
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Registered in England and Wales, No 2366977

National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

I enclose a plan showing the location of National Grid's apparatus in the Bodelwyddan area as follows:

- overhead lines;
- the substation; and
- underground cables.

Specific Comments – Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

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Registered in England and Wales, No 2006000

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Warwick Technology Park
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CV34 6DA

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully

[redacted]

Anne Holdsworth
DCO Liaison Officer, Land Rights and Acquisitions

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Mona Offshore Wind Project NGET Asset Plan 1

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Pillar
- Oil Tank
- Link Box
- Gauge
- Joint Bay
- Cable Joint
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Electric Land Ownership - Freehold
- Electric Land Ownership - Leasehold
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing Sleeve
  - Nitrogen Sleeve
  - Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:

Mona Offshore Wind Project NGET Asset Plan 1

0 0.25 0.5 Kilometers

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Date: 10/05/2022
Time: 15:38:33

Page size: A3 Landscape Scale: 1: 10,000
Print by: **Holdsworth, Anne**

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Note: Any sketches on the map are approximate and not captured to any particular level of precision.

From: NATS Safeguarding
To: Mona Offshore Wind Project
Subject: RE: EN010137 - Mona Offshore Wind Farm - EIA Scoping Notification and Consultation [SG32593]
Date: 09 May 2022 13:20:28
Attachments: [redacted]

Our Ref: SG32593

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc **objects to the proposal**. The reasons for NATS's objection are outlined in the attached report TOPA SG32593.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

NATS

NATS Safeguarding
E: natssafeguarding@nats.co.uk
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Prepared by:
NATS Safeguarding Office

Technical and Operational Assessment (TOPA)

For Mona Offshore Wind Farm Development

NATS ref: SG32593

Issue 2

NATS Public

Contents

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Publication History

Issue	Month/Year	Change Requests and summary
1	January 2022	Combined Pre-Planning Assessment
2	May 2022	Scoping Request

Document Use

External use: Yes

Referenced Documents

1. Background

1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3. Application Details

The Planning Inspectorate submitted a request for a NATS technical and operational assessment (TOPA) for the development at Mona Offshore Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Hub (m)	Tip (m)
1	53.6380	-4.0504	264536	417678	207	367
2	53.6547	-4.0507	264570	419532	207	367
3	53.6713	-4.0510	264605	421385	207	367
4	53.6880	-4.0513	264639	423238	207	367
5	53.7047	-4.0515	264674	425092	207	367
6	53.7213	-4.0518	264708	426945	207	367
7	53.7380	-4.0521	264744	428800	207	367
8	53.7546	-4.0524	264778	430653	207	367
9	53.7713	-4.0527	264813	432506	207	367
10	53.7880	-4.0530	264847	434360	207	367
11	53.6383	-4.0162	266795	417640	207	367
12	53.6549	-4.0165	266828	419494	207	367
13	53.6716	-4.0168	266862	421348	207	367
14	53.6883	-4.0171	266896	423202	207	367
15	53.7049	-4.0174	266929	425055	207	367
16	53.7216	-4.0177	266964	426908	207	367
17	53.7382	-4.0179	266998	428762	207	367
18	53.7549	-4.0182	267031	430615	207	367
19	53.7715	-4.0185	267065	432468	207	367
20	53.7882	-4.0188	267099	434322	207	367
21	53.8048	-4.0191	267132	436175	207	367
22	53.8215	-4.0194	267166	438029	207	367
23	53.8382	-4.0197	267200	439882	207	367
24	53.8548	-4.0200	267234	441735	207	367
25	53.6219	-3.9818	269021	415750	207	367
26	53.6385	-3.9821	269054	417604	207	367
27	53.6552	-3.9824	269087	419457	207	367
28	53.6718	-3.9826	269120	421310	207	367

29	53.6885	-3.9829	269153	423164	207	367
30	53.7051	-3.9832	269186	425017	207	367
31	53.7218	-3.9835	269219	426871	207	367
32	53.7385	-3.9838	269252	428724	207	367
33	53.7551	-3.9841	269284	430577	207	367
34	53.7718	-3.9844	269317	432431	207	367
35	53.7884	-3.9846	269350	434284	207	367
36	53.8051	-3.9849	269383	436137	207	367
37	53.8217	-3.9852	269415	437991	207	367
38	53.8384	-3.9855	269449	439844	207	367
39	53.8551	-3.9858	269482	441699	207	367
40	53.6221	-3.9476	271281	415712	207	367
41	53.6387	-3.9479	271313	417566	207	367
42	53.6554	-3.9482	271345	419419	207	367
43	53.6887	-3.9488	271410	423126	207	367
44	53.7220	-3.9493	271474	426833	207	367
45	53.7553	-3.9499	271537	430539	207	367
46	53.7720	-3.9502	271569	432393	207	367
47	53.7887	-3.9505	271601	434247	207	367
48	53.8053	-3.9508	271633	436101	207	367
49	53.8220	-3.9511	271665	437954	207	367
50	53.8386	-3.9513	271698	439807	207	367
51	53.6056	-3.9132	273511	413821	207	367
52	53.6223	-3.9135	273542	415675	207	367
53	53.6389	-3.9137	273573	417528	207	367
54	53.6723	-3.9143	273635	421235	207	367
55	53.7056	-3.9149	273697	424941	207	367
56	53.7389	-3.9155	273759	428649	207	367
57	53.7556	-3.9157	273790	430503	207	367
58	53.7722	-3.9160	273821	432356	207	367
59	53.7889	-3.9163	273852	434209	207	367
60	53.8055	-3.9166	273883	436063	207	367
61	53.6058	-3.8790	275773	413783	207	367
62	53.6225	-3.8793	275803	415637	207	367
63	53.6391	-3.8796	275833	417490	207	367
64	53.6558	-3.8798	275863	419343	207	367
65	53.6891	-3.8804	275923	423051	207	367
66	53.7224	-3.8810	275983	426758	207	367
67	53.7391	-3.8813	276013	428611	207	367
68	53.7558	-3.8816	276043	430465	207	367
69	53.7724	-3.8819	276073	432318	207	367
70	53.6060	-3.8448	278034	413745	207	367
71	53.6227	-3.8451	278063	415599	207	367
72	53.6393	-3.8454	278092	417453	207	367
73	53.6560	-3.8457	278121	419307	207	367
74	53.6727	-3.8460	278150	421160	207	367
75	53.6893	-3.8463	278179	423013	207	367
76	53.7060	-3.8465	278209	424867	207	367
77	53.7226	-3.8468	278238	426720	207	367
78	53.7393	-3.8471	278267	428574	207	367

79	53.6062	-3.8107	280295	413709	207	367
80	53.6229	-3.8109	280323	415562	207	367
81	53.6395	-3.8112	280351	417415	207	367
82	53.6562	-3.8115	280379	419269	207	367
83	53.6728	-3.8118	280408	421122	207	367
84	53.6895	-3.8121	280436	422976	207	367
85	53.7062	-3.8124	280464	424829	207	367
86	53.7228	-3.8127	280493	426682	207	367
87	53.6064	-3.7765	282556	413671	207	367
88	53.6230	-3.7768	282583	415524	207	367
89	53.6397	-3.7771	282610	417378	207	367
90	53.6564	-3.7773	282638	419231	207	367
91	53.6730	-3.7776	282665	421084	207	367
92	53.6897	-3.7779	282692	422938	207	367
93	53.6066	-3.7423	284816	413633	207	367
94	53.6232	-3.7426	284843	415486	207	367
95	53.6399	-3.7429	284869	417340	207	367
96	53.6565	-3.7432	284896	419193	207	367
97	53.6732	-3.7435	284922	421046	207	367
98	53.6234	-3.7084	287103	415448	207	367
99	53.6400	-3.7087	287129	417302	207	367
100	53.6567	-3.7090	287154	419156	207	367

Table 1 – Turbine Details

4. Assessments Required

The proposed development falls within the assessment area of the following systems:

RADAR	Lat	Long	nm	km	Az (deg)	Type
Claxby Radar	53.4501	-0.3083	122.2	226.2	278.2	CMB
Clee Hill Radar	52.3983	-2.5975	83.6	154.9	329.2	CMB
GDF Radar	54.6841	-2.4509	73.3	135.7	221.9	CMB
Lowther Hill Radar	55.3778	-3.7530	91.9	170.2	183.4	CMB
St Annes Radar	53.7684	-2.9908	26.5	49.0	263.4	CMB
Manchester Radar	53.3407	-2.2827	53.9	99.7	291.0	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
None						
Airports Surv	Lat	Long	nm	km	Az (deg)	Type
None						
Airports Nav	Lat	Long	nm	km	Az (deg)	Type
None						
Airports AGA	Lat	Long	nm	km	Az (deg)	Type
None						

Table 2 – Impacted Infrastructure

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on St Anne's RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.2. Predicted Impact on Lowther RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.3. Predicted Impact on Great Dun Fell RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.4. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Prestwick Centre	Unacceptable
London Area Control Centre	Unacceptable
Military Air Traffic Control	Unacceptable

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

The anticipated impact on NATS' navigation aids has been deemed to be unacceptable.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

The anticipated impact on NATS' radio communications infrastructure has been deemed to be unacceptable.

5. Conclusions

5.1. En-route

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable from an en-route perspective.

Appendix A – Background RADAR Theory

Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of P_t the power density, P, at a range of r is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where G_t is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of σ, this can be treated as if the object re-radiates the pulse with a gain of σ and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area, A_e, and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where G_t is the RADAR antenna's receive gain in the direction of the object and λ is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable L

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where r_t and r_r are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams

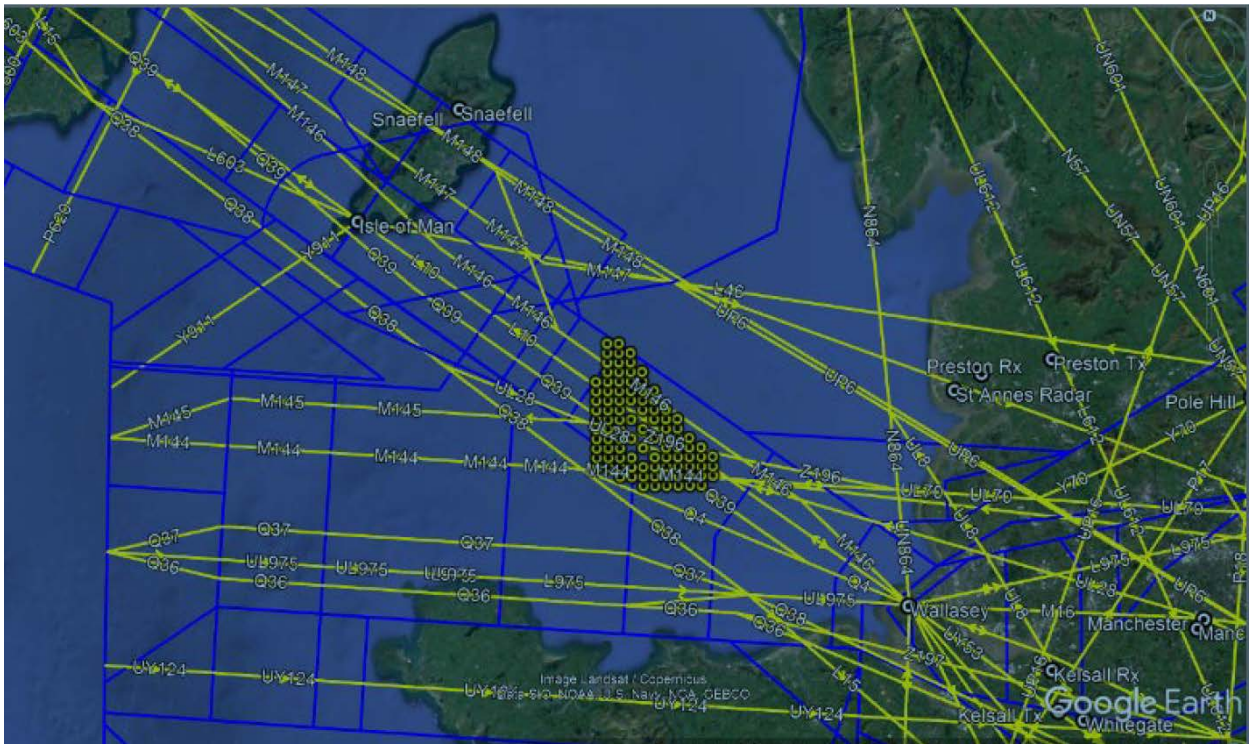

Figure 1: Proposed development location shown on an airways chart

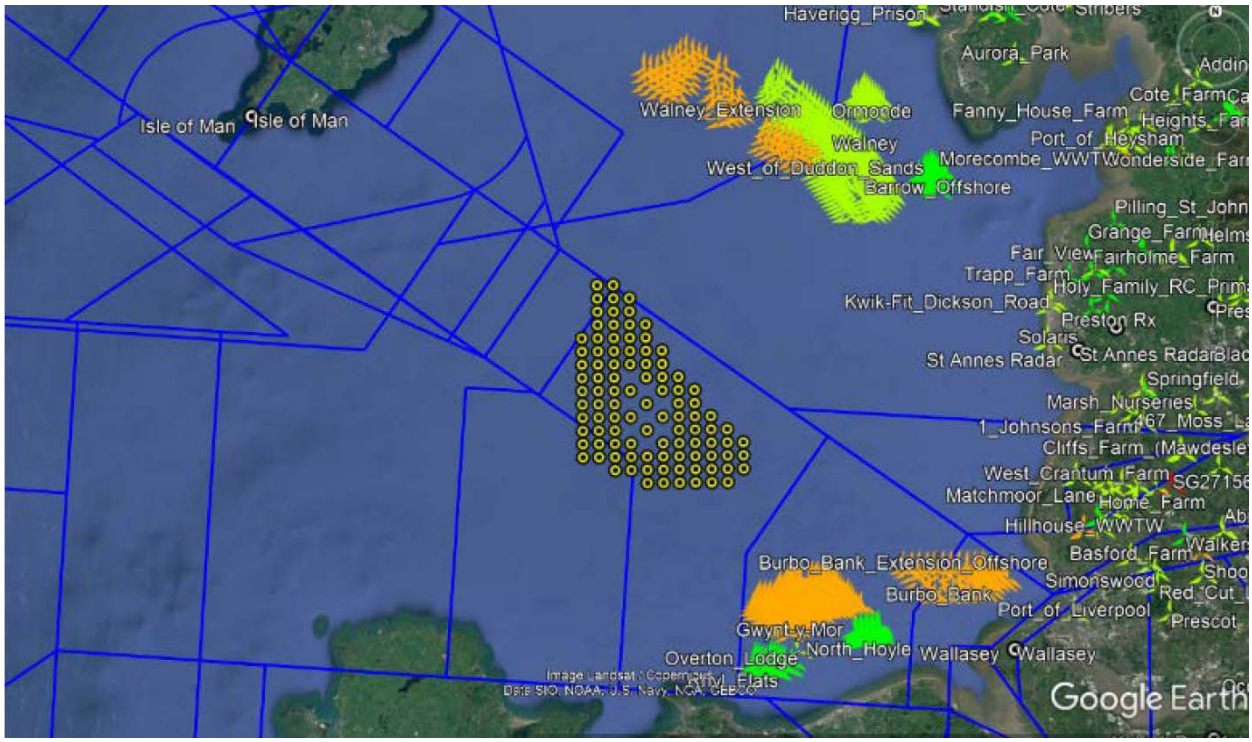

Figure 2: Proposed development shown alongside other recently assessed applications

consented/built | impact –accepted | impact –objection | mitigated
mitigation –proposed | no impact | refused/withdrawn

Date: 01 June 2022
Our ref: 22181/390930
Your ref: EN010137-000008

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire CW1 6GJ

T [redacted]

Hannah Terry
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

BY EMAIL ONLY

Dear Ms Terry

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter dated 5 May 2022 consulting Natural England on the Mona Offshore Wind Farm Environmental Impact Assessment Scoping Report. The following constitutes Natural England's formal statutory response; however, this is without prejudice to any comments we may wish to make in light of further submissions or on the presentation of additional information.

Summary of Main Points

Natural England's remit covers England and English waters out to 12 nautical miles. The Joint Nature Conservation Committee (JNCC) has delegated to Natural England (NE) the statutory powers to provide renewable energy casework advice in the English offshore region (12-200nm). We have focused our comments in our response to the Mona Offshore Wind Farm (OWF) Scoping Report within the remit of English inshore and offshore waters, and defer to Natural Resources Wales (NRW) and JNCC for advice within their remits.

<u>Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards</u>
Natural England has been leading the 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' project, funded by Defra's Offshore Wind Enabling Actions Programme (OWEAP).

The project is providing up-front best practice advice on the way data and evidence is used to support offshore wind farm development and consenting in English waters, focussing on the key ecological receptors which pose a consenting risk for projects, namely seabirds, marine mammals, seafloor habitats and species and fish.

The project aims to facilitate the sustainable development of low impact offshore wind by increasing clarity for industry, regulators and other stakeholders over data and evidence requirements at each

stage of offshore wind development, from pre-application through to post-consent.

The advice documents are currently stored on a SharePoint Online site, access to the SharePoint site needs to be requested from neoffshorewindstrategicsolutions@naturalengland.org.uk. Please allow up to three working days for requests to access the site to be granted. Natural England is currently reviewing ways of making the advice more accessible and open access.

Physical Processes

It is vital that the marine and coastal physical processes within, and in the vicinity of, the proposed development are well understood in order to provide robust estimates of the temporal and spatial scale of changes to hydrodynamic and sediment transport regimes and to the subtidal, intertidal and supratidal environments.

We advise that secondary scour protection impacts on seabed habitats is scoped in until further detailed methods and impacts can be assessed and justification provided to scope out of the Environmental Statement.

Underwater noise

We recommend that underwater noise modelling of the operational wind farm noise is undertaken using the best available evidence and reasonable assumptions based on wind turbine generators that are of representative size for the Mona OWF.

In regard to modelling fish for the purpose of exposure, we advise that all fish hearing groups (Group 1 to 4 fish) should be assessed as static receptors.

Marine Mammals

Marine Mammal Management Units should be used as the regional study area for the purposes of calculating the reference populations, the screening extent as regards Special Areas of Conservation, and for cumulative impacts spatial screening extent.

We have provided some additional evidence sources within our advice, and recommend that consideration of the use of these sources in establishing the baseline characterisation.

It is our opinion that harbour seals cannot yet be excluded from the high-level assessment until there is suitable evidence (i.e. from the results of the complete digital aerial survey campaign) for their exclusion.

We do not agree that impacts from operational turbines can be scoped out at this stage. The size of the wind turbines proposed for this project are significantly larger than those that were the subject of the various referenced studies. We advise that the underwater noise modelling includes an assessment of underwater noise emissions from operational wind turbines, using the best available evidence and reasonable assumptions.

We advise that geophysical surveys should be included as a source of underwater noise in the cumulative impact assessment.

Offshore ornithology

Tracking studies should also be used where available to evidence connectivity, or lack thereof, they should also be used to aid screening where possible.

We are currently unable to advise in detail on the proposed approach to assessing displacement and collision effects, as these are highly technical assessments. The appropriate methodology including parameterisation of models are being considered through the Evidence Plan process.

Transmission Assets

We understand that the Grid Connection and cable routes are still to be determined. Where we have not commented under Generation Assets (which would be applicable to the Transmission Assets) we

defer to advice from NRW as these are largely within Welsh offshore and inshore waters.

If, during the refinement of project details for Transmission Assets it becomes apparent that there may be further considerations for English waters and designated sites, Natural England will provide further advice as necessary.

We have provided specific comments to sections of the Mona Offshore Wind Farm Scoping Report in the following annexes of this letter:

Annex 1 Introduction
Annex 2 Generation Assets and Transmission Assets

For clarification of any points in this letter, please do not hesitate to contact Natural England using the details provided below.

Yours sincerely
Aurélie Bohan-Rayson

Strategic Coastal Lead Adviser
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team
[redacted]@naturalengland.org.uk

Annex 1 Introduction

Part One – Introduction			
Section	**Paragraph/Table**	**Comment**	**Recommendations**
1.1.1	1.1.1.1	It would be helpful for the Environmental Statement (ES) to provide a map showing the location of the Mona OWF project relative to the Morgan OWF project. This map should also show the other operational, under construction, consented and submitted OWFs in the vicinity of Mona OWF.	Include in the ES.
3.2.1	3.2.1.2	At present, there is no confirmed Grid Connection point from National Grid, and no definitive location of any onshore substation. Although it is likely to be within North Wales. Should the grid connection point be outside of the areas considered within the scoping report it may be necessary to rescope the project. The decision to scope is one the applicant has undertaken at their own risk, and Natural England reserves the right to amend or update our opinion based on the final grid location, once it is known, particularly with respect to impacts within English waters, or English designated sites.	To note.
3.8.1	3.8.1.2	Natural England has recently produced advice[1] on scour and cable protection, we advise that solutions that result in no, or minimal environmental impact to the seabed should be considered. This could therefore be considered to remain in situ at the end of the project lifetime on the evidence that this results in the most cost effective and sustainable approach.	Review and consider for scour and cable protection measures.
4.5.3	4.5.3	Identification of receptors and the sensitivity of receptors to impact scale definitions should be discussed and agreed as part of the Evidence Plan process with the relevant Expert Working Group (EWG).	These definitions should be set out within the ES.
4.5.4	Table 4.1	A matrix for assessment of significance is provided as an example, demonstrating how the sensitivity of receptor against magnitude of impact can determine the significance of effect. As with above comments, sensitivity of receptor, magnitude of impact and the matrix of significance of effect should be	Discuss and agree with the relevant EWGs and definitions should be provided in the ES.

[1] Scour and Protection Decommissioning Study Natural England Commissioned Report NECR403 March 2022

		discussed and agreed through the Evidence Planning process.	
4.5.4	4.5.4.3	We understand that at the current stage this is a high level definition, however, all definitions will require refining.	Discussion and agreement should be sought through the Evidence Plan process with the relevant EWG.
4.6.2	4.6.2.2	Ideally, most potential impacts could be avoided, or effects reduced at the design stage of the project, through early consideration of ecological constraints, which along with consideration of other environmental features would be used to refine scheme layout, siting and design. Further impacts could also be avoided through siting of infrastructure at the construction stage.	We advise that the ES demonstrates that the mitigation hierarchy has been followed wherever appropriate.
4.6.2	4.6.2.3	We welcome the commitment to explore opportunities to develop enhancement measures and to create beneficial effects.	
4.7.2	4.7.2.2	Consideration of climate change impacts over the operational period of Mona OWF should be considered. These impacts will become important if they cause an alteration in the baseline conditions and become detectable above natural inter-annual variations.	To note.

Annex 2 Generation Assets and Transmission Assets

Part 2 Generation Assets

Section 3.1 Physical processes

Part Two – Generation assets			
Section	**Paragraph/Table**	**Comment**	**Recommendations**
3.1.2	3.1.2.1	We advise that there may be additional data available from; Channel Coast Observatory, North West and North Wales Shoreline Management Plan, and Environment Agency LiDAR data.	Review and include in ES.
3.1.3	Table 3.1	While we note that water depth is relatively constant across the study area and no large banks were present, we seek clarity on the presence of any sand wave features within the area. In understanding any potential impacts it would be beneficial to have a clear understanding of sand wave height, wave lengths and migratory rates.	Clarify post-scoping and present any relevant information on sandwaves within the ES.
3.1.4	3.1.4	It would be beneficial to have mapped display of the deployed metocean buoys, including both site-specific deployment as well as historic data from Ormonde OWF and the proposed Round 3 Irish Sea OWF Development Zone.	Include in ES.
3.1.4	3.1.4.1	The evidence presented set out variation in the tidal currents across the study area, further evidence on the tidal currents and current directions, for both flood and ebb currents would be beneficial. It would be beneficial to have a mapped display of this information. This would support a clear baseline of the hydrodynamics within the study area.	Include in ES.
3.1.4	3.1.4.17	If a modelling approach is to be adopted, early engagement with the Statutory Nature Conservation Bodies (SNCBs) is recommended.	We advise that the model is discussed and agreed through the Evidence Plan process via the EWG.
3.1.4	Table 3.2	Little information is provided on seabed preparation activities, due to the early stage of the project. Natural England reserve the right to make future detailed comments once further information is known, this could include scoping in of additional	To note. Further discussion would be welcomed through the Evidence Plan process via the EWG.

		impacts.	
3.1.5	Table 3.3	While we do not anticipate significant impacts resulting from the scour protection measures (as these will be subject to engineering design to ensure suitability for this project), it is our view that it is too early to scope out secondary scour protection impacts on the seabed at this stage.	We advise that this is scoped in until further detailed methods and impacts can be assessed and justification provided to scope out of the ES.
		Consideration of the Mersey Tidal Power Project should be considered in the cumulative effects assessment. Currently this project is only at early concept planning stage.	To note.

Section 3.2 Underwater noise

Section	Paragraph/Table	Comment	Recommendations
3.2.4	3.2.4.2	We advise that underwater noise modelling is undertaken for wind turbine generators that are of representative size for the Mona OWF. Part of this modelling should include information on the distance over which noise levels are increased, and could affect marine mammals. The data presented on Ormonde OWF is not sufficiently representative of Mona OWF to remove the need for project-specific modelling.	Undertake project-specific underwater noise modelling of the operational wind farm noise. Seek out data on underwater noise from operational windfarms with wind turbine generators of a more comparable size to those proposed for Mona and assess this as part of the underwater noise modelling approach.
3.2.7	Table 3.8	Natural England are in broad agreement with the swim speeds proposed to be used for the marine mammal receptors.	To note.
3.2.7	Table 3.8	However, we disagree with the swim speeds being proposed for fish species. We advise that all fish hearing groups (Group 1 to 4 fish) should be assessed as static receptors for the purpose of exposure modelling.	Model fish as static receptors for the purpose of exposure modelling. Note that Cefas are the technical specialists on underwater noise impacts to fish therefore we defer to comments they have made on the subject.

4.1 Benthic subtidal and intertidal ecology

Section	Paragraph/Table	Comment	Recommendations
4.1.5	Table 4.4	As mentioned in our comments earlier under Physical	To note.

		Processes 3.1.4 Table 3.2, it is unclear what seabed preparation activities will be undertaken. If dredging activities are undertaken there may be additional impacts to benthic ecology that will need to be considered. Natural England reserve the right to make future detailed comments once further information is known, this could include scoping in of additional impacts.	Further discussion would be welcomed through the Evidence Plan process via the EWG.

4.2 Fish and shellfish ecology

Section	Paragraph/Table	Comment	Recommendations
4.2.5	Table 4.10	As stated above in our comments under 3.2 Underwater noise, we disagree with the swim speeds being proposed for fish species. We advise that all fish hearing groups (Group 1 to 4 fish) should be assessed as static receptors for the purpose of exposure modelling.	The ES should model fish as static receptors for the purpose of exposure modelling. Note that Cefas are the technical specialists on underwater noise impacts to fish therefore we defer to comments they have made on the subject.
4.2.5	Table 4.11	Wind turbine size and generation has progressed since the date of the evidence provided to scope out 'Underwater noise from wind turbine operation during operation and maintenance phase'. We advise that further consideration and justification is required.	Discussion and agreement should be sought through the Evidence Plan process with the relevant EWG.

4.3 Marine mammals

Section	Paragraph/Table	Comment	Recommendations
4.3.2	4.3.2.3	We advise that the data derived from the site-specific aerial surveys is considered alongside existing data for the area when selecting the best/most precautionary estimate of marine mammal density to use for the quantitative assessment.	To note.
4.3.2	4.3.2	We advise that the regional study area for each marine mammal receptor should be based on the relevant Management Unit (MU) for that receptor, insofar as the study area or MUs should be used to determine the appropriate reference population, Special Areas of Conservation (SACs) that should be screened	Use the MUs as the regional study area for the purposes of calculating the reference populations, SAC spatial screening extent, and cumulative impacts spatial screening extent.

		in for consideration, and the spatial extent for screening projects into the Cumulative Impact Assessment (CIA).	
4.3.2	Figure 4.17	As displayed in this figure, the array scoping boundary is not fully covered by the study area and therefore the extent of the digital aerial surveys. Although we understand that the Applicant is proposing to reduce their array area post-scoping, there would be significant shortcomings in the baseline characterisation presented in the Environmental Statement if this was not to occur.	To note.
4.3.3	Table 4.12	The following data sources should also be considered for inclusion: • Data from the digital aerial surveys undertaken for more recent OWFs in the area e.g. Awel y Mor, including other Round 4 projects if available (Morgan OWF; Morecambe OWF) • Seal count data from the Hilbre Island Observatory; • Waggitt *et al.* (2020)[2]. We understand that an updated version of the Atlas of the Marine Mammals of Wales is due to be published soon, similarly information from the latest Offshore Energy Strategic Environmental Assessment (OESEA) should also be included if available.	Consider utilising the additional sources in the baseline characterisation.
4.3.4	4.3.4.1	We note that a number of individuals could not be identified to species level. We welcome clarification on how these observations are going to be included in the assessment to ensure that species' density estimates are not underestimated.	To note.
4.3.4	4.3.4.37	The Applicant should clarify which MUs for seals are to be included in the reference population.	Clarify post-scoping and be clear in the ES which MUs have been used.
4.3.4	4.3.4.40	Carter *et al.* (2020)[3] should also be used as a source of telemetry data for seals, which can inform the movements and origins of seals in the study area.	Use Carter *et al.* (2020) telemetry data.
4.3.4	4.3.4.52	We note that harbour seal have been observed in the site-specific digital aerial surveys (n=1) and geophysical surveys	Consider inclusion of harbour seals at the ES stage for a high-level assessment (subject to

[2] Waggitt, J.J., Evans, P.G., Andrade, J., Banks, A.N., Boisseau, O., Bolton, M., Bradbury, G., Brereton, T., Camphuysen, C.J., Durinck, J. and Felce, T., 2020. Distribution maps of cetacean and seabird populations in the North-East Atlantic. Journal of Applied Ecology, 57(2), pp.253-269.

[3] Carter, M.I., Boehme, L., Duck, C.D., Grecian, J., Hastie, G.D., McConnell, B.J., Miller, D.L., Morris, C., Moss, S., Thompson, D. and Thompson, P., 2020. Habitat-based predictions of at-sea distribution for grey and harbour seals in the British Isles. Sea Mammal Research Unit, University of St Andrews, Report to BEIS, OESEA-16-76/OESEA-17-78.

		(n=4). We therefore do not agree that the receptor should be scoped out at this stage. Once the full digital aerial survey results have been analysed, it may be possible to undertake a high-level assessment should the species continue to be recorded in very low numbers.	results of complete digital aerial survey campaign).
4.3.4	4.3.4.53	As per our previous comment, we advise that the specific marine mammal MUs are the appropriate spatial extent to undertake an initial screening of designated sites.	Use the specific marine mammal MUs as the initial screening extent for SACs.
4.3.4	Table 4.14	There are errors in this table such as referring to species as habitats, reference to benthic, subtidal and intertidal ecology in the table caption, and incomplete sentences.	Ensure table is correct if used in the ES.
4.3.5	Table 4.15	We advise that the Applicant include Temporary Threshold Shift (TTS) in their ES assessment. Specifically, they should model TTS impact ranges from piling and other noise sources, and number of animals within those impact ranges. However, we do not expect an assessment of the significance of TTS due to the paucity in understanding of the biological significance of TTS.	Model TTS distances and number of animals within the impact range.
4.3.4	Table 4.15	When assessing disturbance from underwater noise, we advise that the applicant consider the potential for any barrier effects to occur. The potential for a barrier effect to arise can be informed through a qualitative assessment of movements through the site between key areas, for example telemetry tracks of seals.	Consider inclusion of barrier effects when assessing disturbance of underwater noise.
4.3.5	Table 4.15	Could the Applicant please clarify whether they intend to apply for Unexploded Ordnance (UXO) clearance under a separate Marine Licence or include the activity in the Development Consent Order (DCO)? We advise that the former is more flexible when knowledge of UXOs that require clearance is limited, as is often the case at ES submission stage. If UXO clearance is being undertaken under a separate Marine Licence, we would not expect a full assessment of impact significance in this ES due to lack of knowledge of number, location, size and method of UXO clearance.	Clarify position on UXO clearance.
4.3.5	Table 4.15	The Applicant lists that disturbance will be assessed for vessel use and non-piling noise. We advise that the results of the comparative underwater noise modelling should also be used to inform the risk of injury (even if it is considered unlikely).	To note.
4.3.5	Table 4.15	Disturbance to marine mammals from pre-construction surveys has been included. Whilst we are supportive of this, any	To note.

		meaningful assessment will require information on the number, location, duration, and equipment on such surveys. Mitigation for these surveys will also need to be considered.	
4.3.5	Table 4.16	We do not agree that impacts from operational turbines can be scoped out at this stage. The size of the wind turbines proposed for this project are significantly larger than those that were the subject of the various referenced studies. We advise that the underwater noise modelling includes an assessment of underwater noise emissions from operational wind turbines, using the best available evidence and reasonable assumptions.	Scope in the impact pathway from operational wind turbine noise
4.3.6	4.3.6.1	The applicant is proposing to develop a Marine Mammal Mitigation Protocol (MMMP) for piling but there is no mention of mitigation measures for UXO clearance, which we understand is being assessed in the ES. Intended mitigation measures for UXO clearance should be referenced in the assessment, for example following the JNCC (2010)[4] guidance on the use of explosives, and the recent position statement on the use of low order clearance methods[5].	Consider appropriate suite of mitigation methods for UXO clearance.
4.3.6	4.3.6.1	We would also expect that a vessel management plan would be included that would outline measures to reduce the risk of collision with marine mammals.	Reference the vessel management plan and any measures therein to reduce collision risk with marine mammals.
4.3.7	4.3.7.4	We are unfamiliar with the use of Important Ecological Features (IEFs) in a marine mammal assessment.	We advise that this approach using IEFs are agreed through the Evidence Plan Process via the EWG.
4.3.8	4.3.8.1	Geophysical surveys should also be included as a source of underwater noise in the CIA.	Include geophysical surveys in CIA, where information is available.
4.3.8	4.3.8.2	Although underwater noise is a key cumulative effect, the applicant has not detailed whether any other impact pathways will be considered in the CIA. The applicant should provide a list of pathways that are being screened in or out of the CIA, with rationale to support screening out pathways.	Outline all pathways that are being scoped in or out of the CIA, with appropriate supporting evidence. This can be done at the Preliminary Environmental Information Report (PEIR) stage.
4.3.8	4.3.8.4	As per our previous comment, the appropriate initial spatial screening extent for projects and plans in the CIA is the marine mammal MUs. Also in relation to Section 4.3.10, the MUs should also be used to screen in transboundary sites.	Use the MUs to screen projects and plans in the CIA.

[4] JNCC guidelines for minimising the risk of injury to marine mammals from using explosives. August 2010
[5] Policy paper Marine environment: unexploded ordnance clearance joint interim position statement. Updated 13 January 2022

Section 4.4 Offshore ornithology

Section	Paragraph/Table	Comment	Recommendations
4.4.2	4.4.2.3	The joint SNCB interim displacement advice note and recently added annex: Interim advice on the treatment of displacement for red-throated diver[6] are now published.	Update text and reference.
4.4.2	4.4.2.4	Tracking studies should also be used where available to evidence connectivity, or lack thereof.	Review and consider all relevant tracking studies.
4.4.2	Figure 4.21	It would be helpful if this figure more clearly showed the areas where the buffer extends to a full 10km from the potential array area.	If this Figure is to be used in the ES, add detail to descriptive text (4.4.2.2) and update the Figure to clarify the changing buffer distances and confirm the area that is covered by a full 10km buffer, including rationale for how this was selected.
4.4.3	4.4.3.3	Has the selection of 12% of the sea surface area been justified, or is it simply following precedents from other projects? Although analysis of 12% of the sea surface is thought likely to be sufficient, best practice would dictate conducting a power analysis to determine the level and distribution of survey coverage to analyse. Furthermore, the selection of transect lines spaced at 2km on a NW-SE axis will require further justification, i.e., the gradients that the transects were anticipated to intersect.	We recommend that a power analysis should be carried out to demonstrate that survey coverage is appropriate, with the findings presented in the ES technical annexes. The rationale for the chosen transect lines should be discussed at the EWG, and summarised in the ES. More generally, the applicant is advised to review 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards', which is available on request. Please find further details for access on gov.uk[7].
4.4.3	4.4.3.6	If a modelling approach is to be adopted (e.g. MRSea), early engagement with the SNCBs is recommended.	We advise that before running the model that the parameters are discussed and agreed through the Evidence Plan process via the EWG.
4.4.4	4.4.4.11	Specific tracking studies should also be used to aid screening where possible.	Review and consider all relevant tracking studies.

[6] Joint SNCB Interim Displacement Advice Note 2022
[7] Natural England (2022). Offshore wind – best practice advice to facilitate sustainable development. Naturalengland.blog.gov.uk

4.4.7	4.4.7.3	Has any information on flight height been processed from the baseline survey data? Although Natural England questions the utility of flight height data derived by the 'size-based' and similar methods, if this data has been produced, we would welcome its inclusion for comparison with the generic flight height distributions (Johnston *et al.*, 2014[8]). However, for avoidance of doubt, we would not expect site-specific flight height data to be used in Collision Risk Modelling (CRM).	Confirmation on if information on flight height has been processed.
4.4.7	4.4.7.7	As noted, the SNCB guidance on CRM is currently being updated. This will include updated parameters for use in both the deterministic and stochastic models, noting that technical issues relating to the latter have now been resolved. Further, a revised approach that accounts for macro-avoidance behaviour of gannet by reducing the densities for that species to be considered in CRM is likely to be recommended.	The most appropriate approach for CRM needs to be agreed by the EWG. To assist with this, Natural England propose submitting detailed advice on the approach to CRM in response to the 'Displacement and Collision Risk Modelling Technical Notes' (received from the applicant 27 May 2022) by the 24th June 2022.

Part 3 Transmission Assets

9.1 Seascape, landscape and visual resources

Section	Paragraph/Table	Comment	Recommendations
	9.1.2.2	Where applicable, once the location of the generation and transmission assets has been determined, Natural England should also be consulted to determine representative viewpoints.	To note.
	9.1.2.3	We advise that justification is provided for the proposed use of a 50km buffer for the wind turbine array area for the assessment of seascape, landscape and visual resources. This justification should be based on the proposed wind turbine height for the Mona OWF.	We advise that this is discussed and agreed through the Evidence Plan Process with the relevant EWG.

[8] Johnston, A., Cook, A.S.C.P., Wright, L.J., Humphreys, E.M. and Burton, N.H.K. (2014). Modelling flight heights of marine birds to more accurately assess collision risk with offshore wind turbines. Journal of Applied Ecology, 51(1), pp.31–41. doi:10.1111/1365-2664.12191.

Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our Ref: AOS-21167-0015
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MonaOffshoreWindProject@planninginspectorate.gov.uk

Dyddiad/Date: 31/05/2022

Annwyl / Dear Hannah,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

EIA Scoping Opinion consultation regarding application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) on the EIA scoping opinion for the above proposal received on 05/05/2022. NRW Advisory (A) has reviewed the information provided in the '*Mona Offshore Wind Project Environmental Impact Assessment Scoping Report, May 2022'* Document Code: MO_4000051_01-00_MM_CNS_AEA_Mona-Scoping-Report.

NRW (A) comments provided in this response necessarily focus on those matters that we consider need to be taken into account and applied to the Environmental Impact Assessment (EIA) and the resulting Environmental Statement (ES). However, consideration of other environmental matters may also be relevant, such as (but not limited to): interaction with Welsh Government's MPA Network Completion project; the implications of work under the Offshore Transmission Network Review; and the potential wider implications of The Crown Estates Round 4 Offshore Wind plans, Aggregates, and Floating Offshore Wind (FLOW) leasing round.

With respect to the advice contained within this document relating to nature conservation within Welsh inshore waters, reference to Welsh Offshore waters and English Onshore / Offshore waters may be made in view of mobile species and potential transboundary and cumulative impacts on the Welsh inshore marine area and protected sites. Where potential impacts are wholly within Welsh offshore waters or English Onshore / Offshore waters, NRW (A) defer to comments provided by JNCC and Natural England respectively.

Please note that the comments provided herein are made without prejudice to any (further) advice NRW may need to give, or decisions NRW may need to take, in a project specific context should different circumstances or new information emerge that NRW will need to take into account.

- NRW (A)'s overall opinion is that the applicant has produced a good quality Scoping Report and we welcome the information provided and the way in which it has been presented. Detailed comments have been made under the relevant sections within the attached annex. The key areas that need addressing are summarised as follows, For Marine Physical Processes, NRW (A) advise that seabed levelling; potential of dredge and disposal activities; removal of sediment through seabed clearance; secondary scour; and impacts to sediment transport and sediment pathways at the export cable landfall, are scoped into the project assessment.

- From a Physical Processes and Benthic Ecology perspective, NRW (A) advise that impacts on Habitats Directive Annex 1 habitats outside of protected sites should be considered as far as reasonably possible. In addition, NRW (A) strongly encourage the use of Horizontal Directional Drilling where feasible, to minimise the environmental impact of trenching on conservation features.

- From a Benthic Ecology perspective, NRW (A) do not agree that the potential impacts from Electromagnetic Fields (EMF) can be scoped out. NRW (A) also advise that: the increased risk of introduction and spread of invasive non-native species and the removal of hard substrates are further refined; habitat alteration and increases in thermal emissions from cable operation are scoped in during the operation phase; and temporary habitat loss / disturbance and long-term habitat loss should be assessed. NRW (A) further advise that Little Orme's Head SSSI should be included as a relevant designated site.

- With regards to Fish and Shellfish, NRW (A) advise consideration of: Twaite Shad, European Smelt, River Lamprey and Sea Lamprey under Diadromous fish; the potential for piling noise to disrupt spawning activity for cod and other hearing species; and the inclusion of other species such as Whiting in the assessment of key prey species. NRW (A) further advise that the potential occurrence of Section 7 Priority Species within the study area should be included.

- NRW (A) recommend that Marine Water and Sediment Quality sections are included within the Environmental Statement to aid assessment. NRW (A) do not agree that temperature effects from cabling, or contaminated sediments should be scoped out of the project assessment. NRW (A) advise that the release of bacteria and its enhanced survival due to elevated Suspended Sediment Concentrations, and the potential impact pathway from terrestrial works to the marine environment, should be included.

- With regards to WFD, NRW (A) advise that the following should be included in the list of potential impacts: the impact of contaminated runoff on the quality of transitional and coastal water bodies; EMF's from cabling; and temperature effects from cabling.

NRW (A) also advise that secondary effects of the placement of physical structures associated with cable protection should be covered in Annex B.

- From a Marine Mammal perspective, NRW (A) advise that the Marine Mammal Management Unit (MMMU) is the appropriate scale for consideration of offsite impacts for marine mammals. As such, NRW (A) do not agree with the scoping boundaries and the cumulative assessment search areas described. Furthermore, if Digital Aerial Survey data are to be used in environmental assessments, an assessment of the suitability of analysing data covering 12% of the survey area, such as a power analysis, should be provided alongside evidence of sufficient levels of quality assurance. NRW (A) advise that operational noise should be scoped into the project assessment.

- Regarding Marine Ornithology, NRW (A) advise that further information on how survey design has been arrived at is required. It is likely that all Welsh SPAs and SSSIs with marine or estuarine bird features should be scoped in until surveys are complete and the data analysis has been finalised. NRW (A) also highlight the availability of revised guidance for Red-Throated Diver displacement.

- Regarding Seascape, Landscape and Visual Resources NRW (A) advise the applicant consults CADW, Gwynedd Archaeological Planning Service and the Local Planning Authorities regarding the completeness of the Baseline Environment Section, and Natural England should be consulted regarding potential effects on English Designated Landscapes. NRW guidance should be referenced and applied, along with an explanation of how it has been applied. The assessment should treat each National Park and Area of Outstanding Natural Beauty as a sensitive receptor. The assessment of effect however needs to draw upon the findings of the visual assessment. The singular and cumulative effect upon each NP and AONB will need to be assessed and reported upon.

- For Geology, Hydrogeology and Ground Conditions, NRW (A) note that there are Source Protection Zones at Trofarth Farm and Llannerch Park.

- For Hydrology and Flood Risk, all designated main river and flood defence infrastructure crossings will be subject to a Flood Risk Activity Permit. NRW (A) advise that trenchless technology should be the preferred crossing method.

- With regards to Waste, NRW should be contacted to discuss the necessity for an exemption or permit for any material imported to, treated on, and exported from the site.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Yn gywir / Yours sincerely,

[redacted]

Uwch Gynghorydd Morol – Rhaglen Ynni Adnewyddadwy ar y Môr) /
Senior Marine Advisor – Offshore Renewable Energy Programme
Cyfoeth Naturiol Cymru / Natural Resources Wales

Contents

1 General Comments

1. NRW Advisory (A) welcome the information provided within the Mona Offshore Wind Project EIA Scoping Report and the way it has been presented. In particular, the tables used to illustrate the impacts proposed to be scoped into and out of the project assessment for the various receptors during the different project phases, and the corresponding justifications, are informative and easy to follow.

2. NRW (A) have identified several potential impact pathways that have not been adequately defined or scoped in, which will require additional consideration.

3. The proposed approach to the Cumulative Effects Assessment has been outlined in *Part 1: Section 4.8*. A long list of relevant projects, plans, and activities will need to be drawn up by the applicant, including by way of example: Aggregate Dredging and Disposal; Offshore Energy; Commercial Fisheries; Oil and Gas; Cables and Pipelines; Shipping; Ports; Military, Aviation and Radar; Coastal Developments; and Onshore Works.

2 Physical Processes

2.1 Key Issues

4. NRW (A) welcome the information provided within the Scoping Report for Physical Processes and the way it has been presented. NRW (A) advise that some potential impact pathways need to be refined further and/or scoped in.

2.2 Detailed Comments

2.2.1 Part 1: Introduction

5. *Section 3.4.4.1 Seabed preparation*, states that **'***Seabed preparation may include seabed levelling, and removing surface and subsurface debris such as boulders, fishing nets or lost anchors*.' NRW (A) advise that boulders on the seabed that are to be removed from the site should remain in the marine environment and request further clarification as to the fate of the boulders once they are cleared.

6. With reference to *Section 3.4.5 Scour protection for foundations (artificial fronds)* – in general, NRW (A) discourage the use of artificial fronds made of plastic due to the potential for the polypropylene fronds and/or microplastics to break off into the marine environment. Where frond mattresses are used, NRW (A) advise that the fronds should be biodegradable in seawater, over the long-term, to avoid plastic litter entering the marine environment.

7. In *Section 3.5.2.4 Onshore export cables*, NRW (A) acknowledge that it is not possible to determine which method (Horizontal Directional Drilling (HDD) or trenching) will be used to install the cable across the intertidal to landfall. NRW (A) strongly encourage the developer, where possible, to use HDD, which will have a lesser impact on the physical processes and intertidal ecology.

8. With reference to *Section 3.8 Decommissioning and Repowering*, in the absence of understanding future environmental conditions, NRW (A) advise that all options should be considered including complete removal of installed infrastructure. This includes not only the buried cable, but all cable protection measures employed over the course of the project. NRW (A) endorse Natural England's advice on scour and cable protection (NE, 2022). This report recommends that for future projects requiring scour protection, developers should consider solutions that produce minimal to no negative environmental impact to the seabed and can therefore remain in place at the end of the project, as evidence suggests this is the most cost effective and sustainable approach.

2.2.2 Physical Processes

Please note that the following Physical Processes detailed comments refer to both Part 2: Generation assets and Part 3: Transmission assets.

9. With reference to *Part 2: Section 3.1.2 Study Area*, and in view of potential impacts on the Welsh inshore region, NRW (A) seek clarification on what was used to define one tidal excursion for the Zone of Influence that defined the study boundary for physical processes. The physical processes predicted Zone of Influence should be governed by the maximum spring tidal excursion. The maximum spring tidal excursion ellipse buffer will be site-specific and may vary from inshore to offshore depending on the bathymetry and hydrodynamic forcing. NRW (A) are pleased to acknowledge in *Section 3.1.2.2 Study area,* that the numerical modelling will provide predictions of effects over a wider area than the Mona physical processes study area for waves, tidal elevation and currents, suspended sediments and sediment transport, over multiple tidal cycles. The assessment will therefore also identify any potential impacts that may occur beyond the Mona physical processes study area.

10. NRW (A) would add the following data sources to *Table 3.1:Summary of key desktop datasets and reports (Parts 2 & 3)*:

- **iMARDIS SEACAMS Data Portal:** iMarDIS - Integrated Marine Data and Information System | SEACAMS 2 | and data stored on the **Colwyn Bay Coastal Observatory**, which collects localised hydrodynamic data and characterisation data for Constable Bank
- **North Wales Shoreline Management Plan:** Shoreline Management Plans – North West Coastal Group (mycoastline.org.uk)
- **The Environment Agency National LiDAR Programme:** National LIDAR Programme - data.gov.uk
- **Wales Coastal Monitoring Centre:** Wales Coastal Monitoring Centre | WCMC

11. With reference to *Section 3.1.4 Baseline environment (Parts 2 & 3)*, NRW (A) advise that any data used to inform the baseline understanding must have been collected and analysed in accordance with recognised data quality standards. The sourced data will need to provide the appropriate temporal and spatial coverage and resolution, which will adequately describe the present-day conditions within the study area as well as longer-term historical change. Both are essential to establishing a full conceptual

understanding of the natural physical environment baseline of the site and surrounding area. NRW (A) advise that the data sourced should sufficiently address the key themes of baseline understanding as described in Brooks *et al*., (2018):

- Identification of the processes maintaining the system, the reasons for any past changes, and sensitivity of the system to changes in the controlling processes.
- Identification and quantification of the relative importance of high-energy, low frequency ("episodic" events), versus low-energy, high frequency processes.
- Identification of the processes controlling temporal and spatial morphological change (e.g. longevity and stability of bedforms; cliff recession; loss of beach volume; bank and channel migration; inter-tidal accretion/erosion), which may require a review of bathymetric and topographic data.
- The identification of sediment sources, pathways and sinks, and quantification of transport fluxes.
- The identification of the inherited geological, geophysical, and geotechnical properties of the sediments at the site, and the depth of any sediment strata.
- Interaction of waves and tides and the subsequent quantification of the extent to which seabed sediment is mobilised.
- The assessment of the scales and magnitudes of processes controlling sediment transport rates and pathways.

12. With reference to *Part 2: Section 3.1.4.1 / Part 3: Section 3.1.4.2 Bathymetry,* NRW (A) seek clarification as to whether there are any mobile or stable sand wave features present within the area. Understanding the heights, wavelengths and migratory rates of sand wave features will be essential when determining the potential impacts on seabed morphology through the seabed levelling activities.

13. In *Part 3: Section 3.1.4.2 Bathymetry*, it states "*In the southwest of the Mona physical processes study area for the transmission assets, 7.5km from the coast, there is a 2km wide, 8m high ridge with depths reduced to 6m below LAT at the top of the ridge (Emodin, 2020)*". It would be useful to confirm if the ridge described is Constable Bank.

14. With reference to *Parts 2 & 3: Sections 3.1.4 Baseline environment > Waves,* it would be helpful to include a map showing the location of the metocean buoys deployed for the Ormonde Offshore Wind Project and the Proposed Round 3 Irish Sea Offshore Wind Farm Development Zone in 2010.

15. In view of potential implications to the Welsh inshore region, NRW (A) seek further clarification to understand the flood and ebb current directions more fully at the Mona Array study area as outlined in *Section 3.1.4.9 Tidal currents and elevation*. There is clear variation in direction depending on where the measurements are taken. For example, the Ormonde offshore wind project metocean buoys deployed near the coast to the east of the Mona physical processes study area, showed that the major current axis flowed in an east/northwest direction (GEMS, 2011) although it is not clear what direction was flood and ebb. The metocean buoys deployed in 2010 to monitor the

hydrodynamic conditions within the proposed Round 3 Irish Sea Offshore Wind Farm Development Zone, showed that the tidal current direction varied across the zone: the greatest differences occurring from the southwest of the zone with an observed depth averaged flood and ebb bearing of 56°/236°, to the southeast corner of the zone with a depth averaged flood bearing of 102°/282°. As noted above, it would be helpful to have a map showing the location of the metocean buoys to better understand the current flood and ebb tide patterns. It would also be useful if tidal stream current vectors are produced to describe the baseline hydrodynamics for the Mona study area using the numerical model proposed and using up to date high resolution bathymetric coverage.

16. With reference to *Part 2: Sections 3.1.4.17 – 3.1.4.20 / Part 3: Sections 3.1.4.18 – 3.1.4.21 Sediment transport and suspended sediment*, there is no explanation or presentation of the bed load sediment transport rates and direction in the Mona array area, the transmission asset study area, or at the coast, to inform baseline understanding. NRW (A) advise that a thorough baseline understanding is required to inform any potential impacts to the seabed morphodynamics and the sediment transport processes caused by the project activities offshore, nearshore and across the intertidal.

17. Sand-based sediment features such as sandbanks are important to the sediment budget and have a direct role in protecting the coastline from wave attack as well as being a potential source of sediment supply to the coast. Sand wave clearance and/or the installation of cable protection, can directly impact on the morphodynamics and disrupt the dynamic equilibrium of the sandbank system through alteration to the hydrodynamics which control the sediment transport processes and through the direct loss of sediment (secondary scour/clearance activities). It is important to have a clear understanding of the baseline sediment morphodynamics that control the bedform features in the transmission study area and the sediment transport links to the coast. Particular reference is made to Constable Bank, which is an Annex 1 habitat that supports a wide range of species upon which the conservation objectives of a Special Area of Conservation (SAC) may be based, all of which can be sensitive to disturbance and changes in morphology. Constable Bank is an area of active sand transport and is recognised as playing an important role in supplying sediment to the North Wales Coast. NRW (A) recommends that these Annex 1 habitat features are avoided where possible within Welsh SACs.

18. With reference to *Part 2: Table 3.2 / Part 3: Table 3.3: Impacts proposed to be scoped into the project assessment for physical processes,* NRW (A) advise that the following impacts are scoped into the assessment for both Generation and Transmission Assets:

- **Seabed Levelling** – if sand wave removal/modification is required prior to installation of infrastructure associated with the Array and Transmission Assets, these activities (as well as any material disposal) could potentially cause changes in seabed level and may give rise to secondary effects and changes to the current/flow regime, wave regime and sediment transport regime, resulting in morphological change. NRW (A) advise that seabed levelling is scoped in for both the Construction and Operational Phase and for both Generation and Transmission Assets.

- **Potential of dredge and disposal activities** – it is not clear at this stage if seabed levelling includes dredge and disposal of material. Dredge material disposal could alter the sedimentary character of the seabed at and around the disposal site. NRW (A) therefore advise that, if required, the impact from dredging and disposal at an appointed dredge disposal site will need to be factored into the assessment for physical processes for both the Construction and Operational phases and for both Generation and Transmission Assets.
- **Removal of sediment through seabed clearance** – NRW (A) advise that seabed clearance activities should not remove sediment out of the marine environment. Seabed clearance and the removal of sediment will constitute a permanent loss of sediment from the sediment system, which could alter the local sediment budget and reduce the amount of sediment available for sediment transport. Consideration should be given to potential impacts on the morphological features such as sand banks (in particular Constable Bank) and beaches along the North Wales coastline which provide protection to the coast by absorbing wave energy if there is a reduced supply of sediment to these features. NRW (A) advise that removal of sediment through seabed clearance is scoped in for both the Construction and Operational phases and for both Generation and Transmission Assets.
- **Secondary Scour** - There is no inclusion of secondary scour impacts around cable protection, which may have potential to change seabed morphology (e.g. scour pits and winnowing out of finer sediments can alter sediment substrate). NRW (A) acknowledge that scour is assessed in the benthic ecology chapter in relation to potential loss of habitat, however, the seabed features are a physical processes receptor and should be scoped into the physical processes impact assessment for the Operational Phase for both Generation and Transmission Assets. NRW (A) seek further clarification on which methods will be employed to quantitatively determine the depth of secondary scour that may arise around the cable protection on the seabed.
- **Impacts to sediment transport and sediment pathways at the export cable landfall (Construction and Operation phases – Transmission Assets only)** – The cable and/or cable protection measures may not only disturb or disrupt the intertidal sediment transport at the seabed through blockage effects, but cable protection on the seabed will also reduce the water depth locally, and whether located in the nearshore or intertidal can potentially alter the hydrodynamics (wave approach and currents) and sediment transport, with potential for associated morphological impacts. Consideration should be given to how the coast at the landfall will alter throughout the lifetime of the development, both in terms of vertical change in beach profile which is relevant to cable burial but also coastal retreat (coastal erosion) which is relevant for the siting of jointing bay infrastructure etc. Any blockage effects of the alongshore movement of sediment at the coast will also cause changes to the regional coastal morphology through sediment starvation to downstream locations. Any assessment of impact will require a good baseline understanding of the beach morphodynamics between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS) and seawards of the depth of closure. NRW (A) advise that the baseline description should therefore include detail on the beach profile elevations, the sediment type and the alongshore and cross shore sediment transport processes.

19. NRW (A) welcome the intention to conduct numerical modelling to inform the assessment of impacts as outlined in *Parts 1 & 2: Section 3.1.7 Proposed assessment methodology*. NRW (A) encourage early engagement with our relevant receptor specialists to discuss model set-up and approach (i.e. 2D or 3D) and agree scenario tests. The numerical model employed to assess physical processes impacts should be calibrated and validated using measured data obtained from the study location, which adequately describes the baseline tide levels, currents and directions, wave (including storm waves) and sediment transport processes. NRW (A) advise that any model scenarios which define the baseline physical processes assessment should include any new projects that will be in place prior to the construction phase. A model calibration and validation report should be presented to NRW (A) to confirm accuracy and limitations of the model.

20. With reference to *Parts 2 & 3: Section 3.1.7.3 Proposed assessment methodology*, NRW (A) need to understand more about the nature and extent of the ground preparation works that may be required prior to the construction phase. For example, how much sediment would be excavated and displaced or disposed of for the whole footprint. It is not clear at this stage if seabed levelling includes dredge and disposal of material. The impact from dredging and disposal at an appointed dredge disposal site will also need to be factored into the assessment for physical processes if required.

21. NRW (A) encourage early engagement with NRW specialists when refining the cable routing and site selection process for the offshore electrical transmission (*Part 3: Section 2.4.2 Offshore Cable Route Corridor*).

22. With reference to *Part 3: Section 3.1.4.22 Designated Sites*, NRW (A) advises that developers should also consider, as far as reasonably possible, impacts on Habitats Directive Annex I habitats outside of protected sites, to help ensure compliance with the requirements of the Directive. The overarching aim of the Habitats Directive is to achieve favourable conservation status of Annex I habitats and its typical species, and this aim relates to the entire occurrence of a habitat type within its natural range rather than applying only to the occurrences within the SAC network. NRW (A) therefore consider that the impacts of development or activities on 'undesignated' Annex I habitat outside SACs should be assessed, and adverse effects minimised or mitigated as far as possible. In addition, Article 10 of the Directive acknowledges the importance of improving the ecological coherence of the Natura 2000 network and encourages the management of features which support the migration, dispersal and genetic exchange of wild fauna and flora, both within and outside the Natura 2000 sites.

3 Benthic Subtidal and Intertidal Ecology

3.1 Key Issues

23. NRW (A) welcome the information provided in the Scoping Report and the way it has been presented. However, NRW (A) do not agree that potential impacts from EMF can

be scoped out. In addition, some potential impact pathways need to be refined further and/or scoped in.

3.2 Detailed Comments

3.2.1 Part 1: Introduction

24. NRW (A) discourage the use of artificial fronds made of plastic as described in *Section 3.4.5.1 Scour protection for foundations* – please refer to Paragraph 6 above, for additional detail.

25. With reference to *Section 3.5.2.4 Onshore export cables*, as noted in Paragraph 7 above, NRW (A) strongly encourage the use of HDD where possible given the potential environmental impacts of trenching on conservation features.

26. Please refer to our comments in Paragraph 8 above, relating to *Section 3.8 Decommissioning and repowering* and reference to the recent Scour and Cable Protection Decommissioning Study (Natural England, 2022) as these comments relate to both Benthic Ecology and Physical Processes.

27. NRW (A) welcome the proposal to explore opportunities within the EIA process to develop enhancement measures where appropriate and to create beneficial effects as noted in *Section 4.6.2.3 Measures adopted as part of the project*. NRW (A) would be happy to discuss with the applicant what the most appropriate measures might be for the habitats present in the area.

3.2.2 Benthic Subtidal and Intertidal Ecology

Please note that the following Benthic Subtidal and Intertidal Ecology detailed comments refer to both Part 2: Generation assets and Part 3: Transmission assets.

28. NRW (A) would add the following data sources to *Parts 2 & 3*:*Table 4.1 Summary of key desktop datasets and reports*:

- **Lle Geo-Portal for Wales:** Lle - Home (gov.wales)
- **Data Map Wales:** Home | DataMapWales (gov.wales)

29. NRW (A) would welcome the opportunity to review the assessments of the ‘sea-pen and burrowing megafauna communities’ and ‘low resemblance to rocky reef’ habitats from the preliminary 2021 survey results outlined in *Section 4.1.4.26 Mona benthic subtidal and intertidal ecology study area for the generation assets*.

30. NRW (A) advise that *Table 4.3 Relevant protected benthic species and habitats which have the potential to occur within the Mona benthic subtidal and intertidal ecology study area for the generation assets*, should also include Annex I features outside SACs that might potentially occur within the Mona benthic subtidal and intertidal study area. For further information on how NRW (A) advise on Annex I features outside SACs please refer to Paragraph 22 above.

31. Please note that all reference to ‘Cobble reef’ should be amended to ‘Stony reef’ as this is the correct habitat name/definition under the Habitats Directive.

32. In general, NRW (A) agree with the impacts that have been scoped in, within *Part 2: Table 4.4 / Part 3: Table 4.5 Impacts proposed to be scoped into the project assessment for benthic subtidal and intertidal ecology*, however some require further refinement as detailed below. It is also unclear at present whether any dredging will be required and if so, how potential impacts from dredging will be assessed.

- **Increased risk of introduction and spread of invasive non-native species (INNS)** – NRW (A) advise that this impact is also scoped in during the operation phase as there is a risk of INNS being introduced via vessels used for maintenance activities during the operation phase e.g. cable repairs. Furthermore, NRW (A) advise that the impact should also assess the potential for introduced structures to act as a stepping stone for INNS. NRW (A) advise that a meaningful approach to assessment would be to carry out an assessment of the risk of INNS transfer from vessels (e.g. via calculating maximum number of vessel trips), infrastructure (e.g. maximum surface area that may be available for colonisation by INNS), and potential ‘stepping stones’ hosting INNS populations. Subject to the outcome of the assessment, the need for a detailed biosecurity risk assessment can be identified as mitigation and incorporated into the Project Environmental Management Plan (PEMP).
- **Removal of hard substrates** – When assessing this potential impact, the applicant should consider that the introduction of hard substrate in a soft sediment habitat is a change of habitat type. The loss of a sedimentary habitat to a different habitat type (hard substrate in this case) is not beneficial even if the anthropogenic structure is colonised by local species as the sedimentary habitat is lost and will not be replaced.

NRW (A) further advise that the following impacts should be scoped in during the operation phase:

- **Habitat alteration** – The introduction of hard substrate in the form of cables and scour protection may lead to increased heterogeneity and consequently to new different biological communities, particularly in areas of soft sediment where hard substrate is uncommon. Adjacent habitats may be indirectly affected by infrastructure through scour, changes in hydrodynamics, increased sedimentation/smothering in the construction phase and through additional ongoing scour and change in hydrodynamics in the operation and maintenance phase. This potential impact has not been considered in the scoping report at present – NRW (A) therefore advise that habitat alteration is scoped into the Operation Phase.
- **Increases in thermal emissions from cable operation** – cable operation generates heat that can affect adjacent sediments. These increases in temperature can in turn modify chemical and physical properties of substrates such as oxygen concentrations and bacterial activity, potentially impacting benthic species. NRW (A) advise that increases in thermal emissions from cable operation is scoped into the Operation Phase.

NRW (A) further advise that the following should be assessed in *Part 3: Table 4.5 Impacts proposed to be scoped into the project assessment for benthic subtidal and intertidal ecology*:

- **Temporary habitat loss / disturbance** – potential impacts from cable landing activities should be assessed e.g. impacts from trenchless methods (HDD)
- **Long-term habitat loss** – as above, potential impacts from cable landing activities should be assessed e.g. impacts from trenching.

33. With reference to *Part 2: Table 4.5 / Part 3: Table 4.6 Impacts proposed to be scoped out of the project assessment for benthic subtidal and intertidal ecology*, NRW (A) disagree that the impacts to benthic invertebrates due to electromagnetic fields (EMF) can be scoped out at this stage. There is some evidence that EMFs affect crustacea behavioural patterns (Scott *et al*., 2021, Harsanyi *et al*., 2022) which could potentially include certain species under Section 7 (Environment Wales Act 2016) e.g. Crawfish *Palinurus elephas*. As Section 7 habitats and species have not been incorporated into the current scoping document it is not possible to scope out these elements without further assessment. These should be reviewed and assessed (where appropriate) as part of the Environmental Statement. NRW (A) therefore advise that impacts to benthic invertebrates due to EMF are scoped into the Operation Phase.

34. With reference to Parts 2 & 3: *Section 4.1.7.1 Proposed assessment methodology*, NRW (A) advise that the following guidance document should also be considered when defining stony reef: Refining the criteria for defining areas with a 'low resemblance' to Annex I stony reef (JNCC Report No. 656)

35. NRW (A) note in *Part 3: Section 2.4 Ongoing siting and routing process*, that the potential routes for offshore export cables and landfall are currently undergoing a process of review to refine the potential feasible options. NRW (A) would welcome the opportunity to engage with the applicant in discussions on the potential environmental constraints of the offshore export cable route and landfall options once they been refined further. In particular around potential interactions with sensitive features (Annex I habitats within SACs, Annex I habitats outside SACs, Section 7 habitats and OSPAR habitats).

36. When assessing impacts on Annex I features outside SACs**,** NRW (A) advise that competent authorities and project promoters should also consider, as far as is reasonably possible, impacts on Habitats Directive Annex I habitats outside of protected sites, to help ensure compliance with the requirements of the Directive. Please refer to paragraph 22 above, for further detail.

37. With reference to *Table 4.3 Summary of designated sites with relevant benthic ecology features within the Mona benthic subtidal and intertidal ecology study area for the transmission assets*, NRW (A) advise that Little Orme's Head SSSI also falls within the transmission assets study area and includes benthic features (e.g. Intertidal rocky habitats) as a primary feature in the citation.

38. NRW (A) advise that *Table 4.4 Relevant protected benthic species and habitats which have the potential to occur within the Mona benthic subtidal and intertidal ecology study*

area for the transmission assets, should also include Annex I features outside SACs that may potentially occur within the Mona benthic subtidal and intertidal study area e.g. Constable Bank (Annex I Sandbank outside SAC). Please refer to Paragraphs 22 and 36 above.

39. With reference to *Annex C: Marine Conservation Zone Screening*, NRW (A) defer to advice provided by JNCC and Natural England as this is outside of our remit.

4 Fish and Shellfish

4.1 Key Issues

40. NRW (A) welcome the information provided within the Scoping Report for Fish and Shellfish and the way it has been presented. NRW (A) advise that the Study Area and some potential impact pathways need to be refined further and/or scoped in.

4.2 Detailed Comments

Please note that the following Fish and Shellfish detailed comments refer to both Part 2: Generation assets and Part 3: Transmission assets.

41. In *Section 3.2 Underwater noise*; *Table 3.7 (Part 2) / Table 3.8 (Part 3) Assessment swim speeds of marine mammals and fish that are likely to occur within the Irish Sea for the purpose of exposure modelling*, lists Popper *et al*., (2014) as the reference for swim speeds for fish. However, this reference does not include any guidance for swim speeds when modelling fish as fleeing receptors. NRW (A) advise that fish are modelled as stationary receptors, as a 'worst-case' scenario. If fleeing is incorporated NRW (A) would expect that the chosen swim speed is evidence based and appropriate to the species/life stage and time to evacuate the area impacted by noise.

42. With reference to *Section 4.2.2 Study area*, NRW (A) advise that the NIRAS Consulting Ltd. screening principles as used by The Crown Estate, are adopted to incorporate Annex II migratory fish features.

43. In addition to *Table 4.6 Summary of key desktop datasets and reports*, NRW (A) would recommend that the following data sources are also considered:

- Spawning and nursery grounds of forage fish in Welsh and surrounding water (Campanella & van der Kooij, 2021)
- Pressures on forage fish in Welsh water (van der Kooij *et al.*, 2021)
- NRW also hold records for fish recorded in transitional fish WFD survey data and records of fish recorded in the Dee Trapping Programme – these data are available from NRW on request.

44. NRW (A) welcome the intention to include sightings of basking sharks in the site-specific aerial surveys as outlined in *Section 4.2.4.6 (Part 2) / Section 4.2.4.7 (Part 3) Baseline environment*. NRW (A) also note that collision with vessels is scoped in as a potential impact to marine mammals and advise that basking sharks, as large marine

animals, would also be at risk from collisions, and should therefore be included in the quantitative assessments done for marine mammals.

45. With reference to *Section 4.2.4.10 (Part 2)* / *Section 4.2.4.11 (Part 3) Diadromous fish species*, Twaite Shad have also been recorded in the River Dee (NRW Fish Trap Data). The list of diadromous species should also include European Smelt which have been recorded in the River Dee as well as in the River Conwy.

46. With reference to *Section 4.2.4.11 (Part 2)* / *Section 4.2.4.12 (Part 3) Diadromous fish species*, both River and Sea Lamprey have been recorded in estuarine WFD surveys in the Dee estuary and are routinely recorded in the catches at the NRW Fish Trap on the River Dee at Chester Weir.

47. NRW (A) agree with the assumption that all diadromous fish have the potential to occur in the ecological study area as outlined in *Section 4.2.4.12 (Part 2)* / *Section 4.2.4.13 (Part 3) Diadromous fish species*, however given the diversity in species, life stages and behaviour within the diadromous fish group, NRW (A) do not consider that meaningful seasonal key migration periods can be defined.

48. With reference to Section *4.2.4.17 (Part 2)* / *Section 4.2.4.18 (Part 3) Spawning and nursery grounds*, recent reviews by Cefas have refined and updated spawning grounds for a range of forage fish in Welsh waters – please refer to Campanella & van de Kooij (2021).

49. With reference to *Section 4.2.4.19 (Part 2)* / *Section 4.2.4.20 (Part 3) Spawning and nursery grounds*, NRW (A) notes that there is substantial overlap with the Mona array study area and high intensity spawning areas for several other species, including cod. Cod are considered a hearing species, vocalising during courtship and spawning behaviour. The potential for piling noise to disrupt spawning activity for cod and other hearing species, should therefore be considered.

50. *Section 4.2.4.21 (Part 2)* / *Section 4.2.4.22 (Part 3) Spawning and nursery grounds* – NRW (A) welcomes the intention to undertake further review of herring spawning and nursery grounds to inform the assessment using Agri-Food and Biosciences Institute (AFBI) data. NRW (A) would welcome further information on how the report on impacts to herring from piling operations by Boyle and New (2018) will be considered – is the intention to produce heat maps of spawning activity?

51. With reference to *Section 4.2.4.24 (Part 2)* / *Section 4.2.4.25 (Part 3) Screening of European sites*, NRW (A) advise that the NIRAS Consulting Ltd. screening principles, as used by The Crown Estate, are adopted in the first instance. Subsequently, a stepwise approach can be used based on assessing the nearest European site for diadromous fish features first, and only progressing to sites further afield if the Appropriate Assessment cannot conclude no adverse effects.

52. In *Table 4.9 (Part 2)* / *Table 4.10 (Part 3) Relevant protected fish and shellfish species which have the potential to occur within the Mona fish and shellfish ecology study area*

for the generation assets, NRW (A) advise that inclusion of marine fish listed as Priority Species under Section 7 of Environment (Wales) Act (2016) should also be considered as present within the area, and should be included, e.g. Sandeel, Herring and various Elasmobranchs. In addition, Crawfish *Palinurus elephas* should also be included.

53. NRW (A) agrees with *Table 4.10 (Part 2) / Table 4.11 (Part 3) Impacts proposed to be scoped into the project assessment for fish and shellfish ecology*.

54. With reference to *Table 4.11 (Part 2: Generation assets) Impacts proposed to be scoped out of the project assessment for fish and shellfish*, NRW (A) would welcome further information on the background to operational turbine noise being scoped out based on the cited evidence, e.g. whether the turbine size and foundations are comparable.

55. With reference to *Section 4.2.7.2 Proposed assessment methodology*, NRW (A) would welcome further consultation on which species will be considered in each broad ecological receptor group.

56. NRW (A) advise that other species, such as Whiting are also included in the assessment of key prey species outlined in Section 4.2.7.4 – please see report by Campella & van de Kooij (2021).

57. NRW (A) welcomes the intention to carry out further assessment of herring and sandeel habitat suitability as outlined in *Section 4.2.7.5 Proposed assessment methodology*, and recommend the modelling methods for sandeel described in Reach *et al.* (2013), Latto *et al*. (2013) and MarineSpace Ltd. *et al.* (2013a, 2013b).

58. In *Section 4.2.8 Potential Cumulative Effects*, NRW (A) agrees that most effects will be localised to within the Mona Potential Array Area, except for construction noise. NRW (A) advise that both temporal and spatial cumulative effects are considered, e.g. disturbance to spawning activities over consecutive spawning seasons, from construction of several projects.

5 Marine Water and Sediment Quality

5.1 Key Issues

59. NRW (A) would typically expect the information in an Environmental Statement (ES) to support the Water Framework Directive (WFD) Compliance Assessment and the Habitats Regulations Assessment (HRA); as such, NRW (A) would expect any topic to be covered in the HRA or WFD Compliance Assessment to be introduced in the ES. NRW (A) therefore recommend that Marine Water and Sediment Quality sections are included to aid assessment.

60. NRW (A) do not agree that temperature effects from cabling should be scoped out of the project assessment.

61. NRW (A) do not agree that contaminated sediments should be scoped out of the project assessment for the array area.

62. NRW (A) advise that the release of bacteria and its enhanced survival due to elevated Suspended Sediment Concentrations (SSC) should be considered.

63. NRW (A) advise that the potential impact pathway from terrestrial works to the marine environment should also be included.

5.2 Detailed Comments

64. With reference to *Sections 3.1.4.21 – 3.1.4.23 Stratification*, the report does not identify in detail that Liverpool Bay is a Region of Freshwater Influence, fed by the Rivers Dee, Mersey and Ribble. The region is subject to varying degrees and timescales (e.g. semi-diurnal, up to 5 days) of stratification dominated by the freshwater influence, with temperature acting as a secondary mechanism. To aid site characterisation, NRW (A) recommend that this section is updated with the latest information such as that provided in Howlett *et al*. (2011) and Polton *et al*. (2011).

65. NRW (A) agree with stratification being scoped into the project assessment as outlined in *Table 3.2 Impacts proposed to be scoped into the project for physical processes*, but recommend that any assessment of stratification should also feed through to other receptors e.g. benthic ecology. NRW (A) also agree that a qualitative approach can be applied.

66. In agreement with Section 3.2.2 Benthic and Intertidal Ecology, Paragraph 32 above, NRW (A) advise that temperature effects from cabling should be scoped into the assessment in *Table 4.4 (Part 2) / Table 4.5 (Part 3) Impacts proposed to be scoped into the project assessment for benthic subtidal and intertidal ecology*, with potential effects considered for benthic ecology and bacterial growth. NRW (A) therefore disagree with *Part 2: Section 7.3.4.1* that Heat can be scoped out.

67. NRW (A) agree that accidental pollution can be scoped out of the assessment for the Generation assets (*Tables 4.5; 4.11; 4.16; and 4.20*) and Transmission assets (*Tables 4.6; 4.12; 4.17; 4.20*) in view of Marine Pollution plans being drawn up. Please note that UK legislation such as The Merchant Shipping (Prevention of Oil Pollution) Regulations 2019 and the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998, in addition to guidance such as the work boat code which applies to vessels under 24 m, can also be applied.

68. With reference to *Table 4.5 Impacts to be scoped out of the project assessment for benthic subtidal and intertidal ecology*; and *Table 4.11 Impacts proposed to be scoped out of the project assessment for fish and shellfish ecology*, while some sampling evidence has been documented in the scoping report, there is not a large amount of overlap between study sites and the current array area. Therefore, NRW (A) do not agree that sediment bound contaminants can be scoped out of further assessment for the array area.

69. *Part 2: Figure 4.2 Sample locations undertaken across the Mona Array Scoping Boundary during the summer 2021 benthic survey*, indicates that chemical analyses have been undertaken as part of the 2021 surveys. NRW (A) recommend these results are reported in the ES, compared against CEFAS action levels.

70. NRW (A) advise that release of sediment contaminants should be included in *Table 4.15 Impacts proposed to be scoped into the project assessment for marine mammals.* NRW (A) agree that contaminated sediments should be scoped in for the transmission route for various receptors (*Part 3: Tables 4.5; and 4.11*). Contaminated sediments should be compared to CEFAS action levels where applicable.

71. NRW (A) agree that suspended sediment should be scoped in and modelling undertaken as outlined in *Part 3: Table 3.3 Impacts proposed to be scoped into the project assessment for physical processes*. NRW (A) advise that knowledge of suspended sediment should be used to support any assessment of nearby Bathing Waters. NRW (A) further advise that the potential for bacterial releases from disturbed sediment should be scoped in.

72. NRW (A) advise that *Part 3: Section 5.4 Other Sea Users; Section 5.4.2.4*, should include bathers at recreational, designated bathing waters (or other non-designated bathing waters).

73. The exact onshore boundary location for recreational activities is unclear from *Figure 5.19 Recreational activities in the Morgan regional other sea users study area for the transmission assets and Morgan local other sea users study area for the transmission assets*, so NRW (A) query whether Porth Eirias Water Sports Centre in Colwyn Bay needs to be included in Section 5.4.4.15. We also query the *Figure 5.19* legend specifying Morgan rather than Mona.

74. NRW (A) note that impacts of SSC on bathing water sites have already been scoped in to the project assessment in *Table 5.8 Impacts proposed to be scoped into the project assessment for other sea users*. In addition, NRW (A) advise that the potential to release bacteria from sediment at landfall should also be scoped into the project assessment.

75. NRW (A) agree that main rivers and ordinary watercourses should be scoped into the project assessment in *Table 6.8 Impacts proposed to be scoped into the project assessment for hydrology and flood risk*, due to accidental pollution incidents, as no mitigation has been identified. However, NRW (A) note that a pathway through to the transitional and coastal water bodies has not been identified and should be included (either via a direct pathway or because they are hydrologically linked to rivers).

76. NRW (A) welcome the use of a Construction Environment Management Plan and would appreciate the opportunity to review the document once produced. NRW (A) advise the

applicant to refer to relevant Guidance for Pollution Prevention, including GPP5 Works and Maintenance in or near water.

77. With reference to *Part 3*: *Table 6.9 Impacts proposed to be scoped out of the project assessment for hydrology and flood risk*, NRW (A) agree that contaminated runoff and accidental spills during operation and maintenance can be scoped out.

78. NRW (A) note that the chemical status for the Clwyd has been left blank in Part 4: Annex B: Water Framework Directive Screening; *Table 2.1 WFD status classification for surface water (river, transitional and coastal) and groundwater bodies that overlap with the Mona Onshore Transmission Infrastructure Scoping Search Area and Mona Offshore Transmission Infrastructure Scoping Search Area, and the key elements driving status classification*. The Cycle 3 WFD classifications were released in late 2021 and should be used for further assessment; these can be found on the Water Watch Wales website Water Watch Wales (naturalresourceswales.gov.uk).

79. NRW (A) recommend that the Environment Agency's Water Framework Directive assessment: estuarine and coastal waters (Environment Agency's guidance) is referred to for screening and further detailed assessment, as a number of Water Quality topics have not been identified in *Part 4: Annex B: Water Framework Directive Screening*, e.g. temperature, oxygen, contaminated sediment, bacterial releases, salinity, and releases of Environmental Quality Standards Directive (EQSD) chemicals. Protected areas as defined under the WFD regulations can be found on the Protected Area Register.

80. NRW (A) advise that there is a large dataset available from the British Oceanographic Data Centre relating to the Liverpool Bay Coastal Observatory which ran from 2002 until approximately 2012. The dataset includes bed, surface and subsurface measurements of currents, temperature, salinity and suspended sediment, amongst other parameters, from long-term moored instruments at 2 stations and 30+ CTD stations, which occurred every 4-6 weeks.

81. As a minor point, it would be useful if broad-scale figures can be clearer to assist the reader in identifying relevant points of interest, e.g. how far the onshore scoping area reaches in terms of receptors on the coast.

6 Marine Water Framework Directive

6.1 Key Issues

82. NRW (A) note that some potential impact pathways relevant to Marine Water Framework Directive (WFD) have been missed, whilst others require further clarification. For the most part, NRW (A) agree with the list of potential impacts identified within *Table 2.3 Potential impacts associated with the construction, operation and decommissioning of the Mona Offshore Wind Project on surface and coastal water bodies*, however, NRW (A) advise that the list should also include the following:

- The impact of contaminated runoff on the quality of transitional and coastal water bodies arising from the construction and decommissioning of the onshore transmission assets.
- Electromagnetic Fields (EMFs) from cabling during the operational phase.
- Temperature effects from cabling during the operational phase – heat generated through cable operation can affect adjacent sediments in terms of both physical and chemical properties.

83. NRW (A) advise that secondary effects of the placement of physical structures associated with cable protection should be covered in *Annex B: WFD Screening, Table 2.3 Potential impacts associated with the construction, operation and decommissioning of the Mona Offshore Wind Project on surface and coastal water bodies* under the Impact heading '*Changes in physical processes/hydromorphology associated with structures or alterations to the physical characteristics of a water body during construction, operational and decommissioning phases.'*

6.2 Detailed Comments

84. NRW (A) welcome the proposal to utilise numerical modelling to inform the assessment of Physical Processes as outlined in *Section 3.1.7 Proposed assessment methodology*. Where there is overlap with WFD water bodies, NRW (A) recommend that the outcomes of this assessment inform the WFD Compliance Assessment.

85. *Part 1: Section 3.4.10.1 Landfall*, sets out that where the offshore export cable makes landfall, cables will be installed either by trenchless methods such as horizontal directional drilling (HDD) or open-cut trenching. In line with our comments above in Paragraphs 7 and 25, where technically feasible, NRW (A) encourage utilisation of HDD as the most benign option in terms of environmental effects within the intertidal area.

6.2.1 Part 4: Annex B – Water Framework Directive Screening

86. *Section 2.1.1.1 Background*, states that "*Offshore works beyond 1nm are not relevant to the WFD Compliance Assessment and have not been considered".* NRW (A) advise that, where there is a pathway of effect, for any WFD element in any water body, works must be considered; there may still be a pathway of effect beyond 1nm.

87. With reference to *Section 2.2.1.3 Legislation*, NRW (A) would stress that it is not just deterioration at a water body level that must be considered within the assessment, but deterioration of any element within a water body, even if it does not result in deterioration at the water body level. Please also note that compensation is not a requirement in WFD terms.

88. With reference to *Section 2.2.1.11 Water body objectives*, Article 4 (7) is now referred to as Regulation 19, following transposition of the Directive to the Water Regulations (2017).

89. NRW (A) recommend clarification within *Section 2.2.1.11 Water body objectives*, with respect to the WFD Compliance Assessment. It is not the objective of a Compliance Assessment, for example, "*To prevent deterioration in the ecological status of the water body",* but to assess the metrics of the proposed project to understand if there is a risk of

deterioration as a result of the works associated with it. NRW (A) encourage the Applicant to refer to the Environment Agency's Guidance '*Clearing the Waters for All'*, which provides information on how to carry out a WFD Compliance Assessment for activities within transitional (estuarine) and coastal waters.

90. NRW (A) advise that the Environment Agency's 'Clearing *the Waters for All*' is added to the list of guidance documents outlined in *Section 2.2.2.2 WFD compliance assessment scope*.

91. NRW (A) welcome the opportunity to engage with the Applicant to discuss the scope of the WFD Compliance Assessment associated with the project as outlined in Section 2.2.2.5.

92. With respect to *Section 2.3.3.2 WFD water body status classification* and *Table 2.1 WFD status classification for surface water (river, transitional and coastal) and groundwater bodies that overlap with the Mona Onshore Transmission Infrastructure Scoping Search Area and Mona Offshore Transmission Infrastructure Scoping Search Area, and key elements driving status classification*, NRW (A) advise that Cycle 3 2021 WFD classifications were published in December 2021 and are now available. These are the most recent classifications and should be used to inform the baseline going forward.

93. NRW (A) agree that the North Wales and Mersey Mouth WFD coastal water bodies and the Clwyd transitional water body will need to be considered within the WFD Compliance Assessment as outlined in Table 2.1, however NRW (A) advise that the full list of WFD water bodies will need to be determined by numerical modelling and other assessment methods to fully define the zone of influence and any WFD water bodies that fall within it.

94. NRW (A) note that it is not easy to understand what activities will be scoped in for the individual construction, operation and decommissioning phases of the project as they are all grouped together in *Table 2.3 Potential impacts associated with the construction, operation and decommissioning of the Mona Offshore Wind Project on surface and coastal water bodies*.

95. The impact of contaminated runoff on the quality of transitional and coastal water bodies arising from the construction and decommissioning of the onshore transmission assets should be included within *Table 2.3 Potential impacts associated with the construction, operation and decommissioning of the Mona Offshore Wind Project on surface and coastal water bodies*, as should the potential effects of EMF from cabling and thermal effects from cabling.

96. With reference to Marine WFD, NRW (A) recommend that the applicant refers to the following sources of data in addition to those outlined within the report:

- Lle Geo-portal for Wales for spatial data sets for WFD water bodies**:** Lle - Home (gov.wales)
- Water Watch Wales for data underpinning the WFD Classifications: Water Watch Wales (naturalresourceswales.gov.uk) Please note that Cycle 3 2021 classification data should be used as the baseline for the WFD Compliance Assessment.
- 'Clearing the Waters for all' is a guidance document produced by the Environment Agency, intended to assist applicants on carrying out a WFD Compliance

Assessment for a scheme within transitional and coastal (TrAC) waters: Water Framework Directive assessment: estuarine and coastal waters - GOV.UK (www.gov.uk)

97. With reference to *Part 2: Section 8.5 / Part 3: Section 11.7 Next Steps, Does the reader agree that the proposed study areas are appropriate for each of the EIA topics?* As outlined above, in the case of WFD, NRW (A) advise that all WFD water bodies that fall within the geographic scope of the assessment carried out as part of the wider EIA, in terms of both direct impacts, (e.g. physical footprint of cabling), and indirect impacts (e.g. impacts arising from EMFs on migratory fish) should be considered within the WFD Compliance Assessment. WFD water bodies that overlap with outputs of the proposed numerical modelling should be included within the assessment. Furthermore, NRW (A) agree that the North Wales and Mersey Mouth coastal water bodies, and the Clwyd transitional water body, are included within the assessment, but advise that the list of water bodies is not finalised until the Zone of Influence is fully defined through numerical modelling and other methods.

7 Marine Mammals

7.1 Key Issues

98. NRW (A) do not agree with the rationale of using a study area for scoping of SACs, or for screening for the cumulative / in-combination assessment. The Annex II marine mammal SAC features are mobile and wide ranging. NRW (A) advise that the Marine Mammal Management Unit (MMMU) is the appropriate scale for consideration of offsite impacts for marine mammals as per NRW's Position Statement: *NRW's position on the use of Marine Mammal Management Units for screening and assessment in Habitats Regulations Assessments for Special Areas of Conservation with marine mammal features* (NRW, 2022).

99. Regarding the use of aerial surveys to obtain density estimates, as previously mentioned in our written response following the first Marine Mammal Expert Working Group (EWG) for the Morgan and Mona Offshore Wind Projects on 17th February 2022, if Digital Aerial Survey (DAS) data is to be used in environmental assessments, an assessment of the suitability of analysing data covering 12% of the survey area, such as a power analysis, should be provided to support the approach taken. Alongside this, evidence of sufficient levels of quality assurance should be provided to resolve any concerns regarding the detection probability or species identification confidence associated with the chosen method.

100. NRW (A) advise that operational noise should be scoped into the project assessment, using quantitative noise modelling to confirm absence of an impact pathway.

7.2 Detailed Comments

7.2.1 Part 1: Introduction

101. NRW (A) note that in *Section 3.4.4.2 Seabed preparation*, it states that, '*The UXO risk mitigation strategy will be based on procedures following industry best practice*

(currently mainly according to CIRIA C754 guidelines).' NRW (A) also note in *Section 3.2.7.1 Proposed assessment methodology*, that BEIS (2022) is listed as one of the documents that will be considered for underwater noise assessment. NRW (A) advise confirmation that in addition to the CIRIA C754 guidelines, the joint interim position statement on UXOs developed by BEIS (2022) will also be followed when mitigating UXO risk.

102. In *Section 3.8.1.1 Decommissioning and repowering*, NRW (A) note that the current proposal is for the construction of 107 turbines. Given the number of turbines involved, the operational lifetime of up to 35 years, and that this would signify an approximately 20dB increase in operational noise level in contrast with a single turbine, NRW (A) support the proposal in section 3.2.7.3 that *'Underwater noise modelling is planned to assess the impact of construction and operational noise using a robust, peer reviewed model.'*

103. With reference to *Section 4.8 Cumulative effects assessment; Section 4.8.2.1 Offshore components*, as previously mentioned in our written response following the first Marine Mammal EWG for the Morgan and Mona Offshore Wind Projects on 17th February 2022, it is not clear how these study areas were defined, therefore NRW (A) are unable to agree to them at this stage. To reach agreement, additional information should be provided, specifying what screening, assessment or other purposes the study areas are intended for, and taking into account the following:

- Due to the mobile nature of all Annex II marine mammal features of Special Areas of Conservation (SACs), it is accepted that they do not stay within site boundaries. Where there is a potential and credible effect on the conservation objectives of a site, caselaw supports the need to consider offsite impacts (Moorburg case c-142/16 & Holohan case C-461/17).
- NRW (A) generally consider that the appropriate scale at which to consider offsite impacts for marine mammals is the relevant species-specific Marine Mammal Management Unit (MMMU). NRW (A) consider SACs within an MMMU to be 'functionally linked' to the surrounding sea, because evidence demonstrates a degree of connectivity between SACs and the wider area, and because SACs represent special areas of sea within the MMMU (Chapman & Tyldesley 2016, NRW 2022). For some pathways a different approach may also be relevant, however this depends on the weight of the evidence supporting that approach and should be considered on a case-by-case basis in consultation with NRW (A).
- NRW (A) do not agree with the scoping boundaries, and therefore do not agree with the cumulative assessment search areas described. NRW (A) advise that the MMMU is the appropriate scale for consideration of offsite impacts for marine mammals, and that all plans and projects within the relevant MMMU (IAMMWG, 2015) should be scoped into the assessment as they have the potential to affect the same marine mammal populations. M
- The cumulative and in combination assessment should also consider transboundary impacts from other plans or projects within the relevant MMMUs (NRW, 2022).

7.2.2 Underwater Noise

104. With reference to *Section 3.2.4.2 Baseline environment*, NRW (A) notes that the turbines used in the Ormonde wind farm were jacket pile foundations with a rotor diameter of 126 m, in contrast to rotor diameters of 280 m specified for this project in *Part 1: Table 3.2 Design envelope: key parameters for wind turbines*. Confirmation should be provided that the example given for the Ormonde windfarm is representative of a turbine with a jacket foundation that could potentially be used for this project. Furthermore, measurements or expected noise levels (in dB re 1 µPa) should be provided for the monopile foundation option.

105. NRW (A) considers that whether a noise signal is detectable at range is dependent on a number of factors including source level, background noise level, and transmission loss, which can vary in different environments. Given that propagation range varies with the environment, reporting a maximum range for the increase in noise levels is considered insufficient, and NRW (A) therefore advises specifying a source level in dB re 1 µPa and ideally the received level at the range at which the noise signal was recorded, for the example given.

106. With reference to *Table 3.5 Impacts proposed to be scoped into the project assessment for underwater noise; Effects of underwater noise from wind turbine operation during operation and maintenance,* whilst NRW (A) are aware that there is still some uncertainty regarding the underwater noise impacts of very large turbines during operation, in the event of insufficient data NRW (A) strongly recommend quantifying the impact using noise modelling with appropriately scaled-up proxy source level data, in accordance with the precautionary principle. Furthermore, the proposal to conduct a qualitative assessment of this impact appears to contradict the approach presented in *Section 3.2.7.3 Proposed assessment methodology*, which states that: *'Underwater noise modelling is planned to assess the impact of construction and operational noise using a robust, peer reviewed model.'*

107. NRW (A) support the inclusion of the guidance and measures detailed in *Section 3.2.7.1 Proposed assessment methodology*, to minimise the risk of impact to marine mammals and fish.

108. NRW (A) support the approach outlined for underwater noise modelling in *Section 3.2.7.3 Proposed assessment methodology*, including the potential use of energy flux models. NRW (A) advise that given the impact ranges generally encountered for piling noise, calibration information out to ranges greater than 2.5 km should be provided.

109. NRW (A) agree with the proposal of estimating (1) a realistic and (2) maximum design scenario for assessing the impacts of piling operations as outlined in *Section 3.2.7.4 Proposed assessment methodology*. However, NRW (A) believe that insufficient information has been given on the location/s of the proposed modelling work (e.g. closest location to an SAC, or a source in deeper water), and how this will represent a worst-case scenario.

110. With reference to *Section 3.2.8.1 Potential cumulative effects*, please refer to our comments in paragraph 103 above.

7.2.3 Marine Mammals

Please note that the following Marine Mammal detailed comments refer to both Part 2: Generation assets and Part 3: Transmission assets.

111. With reference to Section 4.3.2 Study area, as noted previously NRW (A) generally consider that the appropriate scale at which to consider offsite impacts for marine mammals is the relevant species-specific MMMU.

112. As previously advised in our written response following the first Marine Mammal EWG for the Morgan and Mona Offshore Wind Projects on 17th February 2022, some additional data sources or informative documents to those outlined in *Section 4.3.3.1 Desktop data*, should be considered for applicability to the desktop baseline study, including the following:

- **Awel y Môr PEIR** Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation, available online; https://exhibition.awelymor.cymru/peir/
- **Gwynt y Môr Baseline Surveys Description** available in the Awel y Môr PEIR Volume 4, Annex 7.1
- **Sea Watch Foundation** data – North Wales (Sea Watch Foundation, 1960-2021). Description available in the Awel y Môr PEIR Volume 4, Annex 7.1
- **Manx Whale and Dolphin Watch** surveys (Manx Whale and Dolphin Watch (MWDW) 2007-2015) Description available in the Awel y Môr PEIR Volume 4, Annex 7.1
- **Anglesey Visual Surveys** (Shucksmith *et al.*, 2009)
- Anglesey Towed Acoustic Surveys (Gordon *et al.*, 2011)
- Wylfa Newydd Surveys (Jacobs, 2018)
- **Morlais Surveys** (Royal Haskoning DHV, 2019)
- Cardigan Bay Bottlenose Dolphin Surveys (Lohrengel *et al.*, 2018)
- An updated version of the **Atlas of the Marine Mammals of Wales** (in prep.)
- The potential applicability for both the telemetry and the density estimates associated with the work of **Carter *et al.*, (2020)**, should be considered.

113. NRW (A) also recommend looking at data availability from the Manx Whale and Dolphin Watch around the Isle of Man. These show some sightings of Minke Whale, and NRW (A) advise that this species is included in the assessment. Seawatch Foundation may also hold data which could be of use in the assessment. The Awel y Mor public PEIR marine mammal baseline document contains a useful summary of the data sources for marine mammals.

114. Where there is no density estimate in SCANS III, SCANS II may be recommended for use in its place. NRW (A) advise that a short, proportionate assessment on species of

very low densities is preferable to scoping them out. Importantly, when considering species which are present at lower densities than suggested by SCANS data, reliance on these data could considerably overestimate the effect on those species (e.g. number of individuals affected by underwater noise). As such NRW (A) would not advocate this type of approach but may favour undertaking a qualitative assessment that acknowledges the very low risk to these species.

115. With reference to *Section 4.3.3.2 Site-specific surveys*, as previously mentioned in our written response following the first Marine Mammal EWG for the Morgan and Mona Offshore Wind Projects on 17th February 2022, if Digital Aerial Survey (DAS) data is to be used in environmental assessments, an assessment of the suitability of analysing data covering 12% of the survey area, such as a power analysis, should be provided to support the approach taken. Alongside this, evidence of sufficient levels of quality assurance should be provided to resolve any concerns regarding the detection probability or species identification confidence associated with the chosen method. This could include, for example, provision of sample images in a range of ID confidence scenarios and visibility conditions. Careful consideration of the confidence in results based on the sample sizes achieved, alongside other survey performance criteria such as seasonal coverage, should be made.

116. Clarification is needed on whether the 12% value is used as standard or if it is specific to this site. More broadly NRW (A) have concerns over the robustness of digital aerial surveys (DAS) for marine mammals depending upon the design. One trip per month, for example, may end up in very low sample numbers for some species, which limits the ability of this data to generate robust density estimates for baseline characterisation. There are also limitations associated with the ability to confidently identify individuals to species level, depending on the quality of the images or video. It would be beneficial if a sample of real images that have been analysed for this project can be provided. This should include images that represent the lower confidence limit for identifying an individual to species level or in adverse weather. In previous examples e.g. Awel-y-Mor, the DAS survey data was deemed to have limited species identification rates and density estimates from DAS have not been taken forward into assessment.

117. NRW (A) are aware that there is not necessarily a better survey method and there is not time to re-survey. NRW (A) therefore recommend that site-specific density estimates are compared against existing data sources and then the most precautionary values are taken forward to the assessment, in line with previous advice on other projects e.g. Awel-y-Mor.

118. In Section 4.3.4.18 White beaked dolphin *Lagenorhynchus albirostris* - NRW (A) notes that a definition of *'key species'* has not been provided.

119. As noted above, with reference to Section 4.3.4.53 Designated sites, NRW (A) generally consider that the appropriate scale at which to consider offsite impacts for marine mammals is the relevant species-specific MMMU.

120. With reference to *Table 4.15 Impacts proposed to be scoped into the project assessment for marine mammals*, NRW (A) largely agree with the list of impacts to be scoped into the assessment, but please note the following points:

- For the column heading: *Data collection and analysis required to characterise the baseline environment,* please refer to our comments above regarding the use of aerial surveys to obtain density estimates.
- For the column: *Summary of proposed approach to assessment*, clarity should be provided regarding the term 'comparative noise modelling'.
- For the impact: *Injury and disturbance from underwater noise generated from piling > Summary of proposed approach to assessment*, NRW (A) agree with the proposal to carry out underwater noise modelling to quantitatively assess the risk of auditory injury in line with the most recently available thresholds. Further information on the methodology to be used for assessing disturbance should be provided, given that assessment of disturbance for harbour porpoise SACs is area-based. The Conservation Objectives for sites designated for Harbour Porpoise specify that noise disturbance from a plan or project will be significant if it excludes harbour porpoise from more than 20% of the relevant (seasonal) area of the site in any given day, or from an average of 10% of the relevant area of the site over the relevant season.
- For the impact: *Injury and disturbance from underwater noise generation from unexploded ordnance > Summary of proposed approach to assessment*, NRW (A) agree with the intention to carry out modelling for UXO detonation activities. Given the differences between shock waves generated by UXO detonation and impulsive noise generated by sources such as pile driving, further detail regarding the approach to be taken towards modelling propagation by UXO noise is advised.
- For the impact: *Disturbance to marine mammals from pre-construction surveys > Summary of proposed approach to assessment*, NRW (A) recommend that full characteristics of the sources to be used in geophysical surveys are disclosed. These would include source level, frequency range, directivity, and survey timetables. Impact will be dependent on the survey methods used e.g. Airguns, Boomers, and Sparkers would be of greater concern than Side Scan Sonar, Pingers or Parametric Sub Bottom Profilers.

121. With reference to *Table 4.16 Impacts proposed to be scoped out of the Mona Offshore Wind Project assessment for marine mammals*, given the uncertainty regarding underwater noise impacts of arrays of very large turbines during operation (as outlined in *Part 2: Table 3.5 Impacts proposed to be scoped into the project assessment for underwater noise*), NRW (A) advise that operational noise should be scoped in for assessment using quantitative noise modelling and appropriate thresholds to confirm absence of an impact pathway, further supported by the evidence already provided in *Part 2: Table 4.16 Impacts proposed to be scoped out of the Mona Offshore Wind Project assessment for marine mammals*, which is based on turbines of smaller size. The proposal to scope out operational noise contradicts the approach presented in Part 2: *Section 3.2.7.3 Proposed assessment methodology*, which states that, '*Underwater noise modelling is planned to assess the impact of construction and operational noise using a robust, peer reviewed model.'*

122. NRW (A) support the assessment methodology outlined in *Section 4.3.7 Proposed assessment methodology*, with reference to guidance on noise management in Harbour Porpoise SACs (JNCC, 2020b). NRW (A) draws attention to the fact that there is still considerable uncertainty in the evidence underpinning the calculation of Effective Deterrent Range (EDR), especially in Welsh waters, and as such has not signed up to the cited JNCC guidance for assessing the significance of noise disturbance against Conservation Objectives of Harbour Porpoise SACs (England & Northern Ireland). NRW (A) therefore advise that applicants should calculate disturbance distances on a case-by-case basis using the latest published information and modelling procedures rather than using EDRs (Sinclair *et. al*., 2021, in press).

123. With reference to *Section 4.3.8 Potential cumulative effects, Section 4.3.9 Potential inter-related effects and Section 4.3.10 Potential transboundary impacts*, as advised above, NRW (A) disagree with the scoping boundaries and therefore do not agree with the assessment search areas described.

124. With regards to *Annex A: Transboundary Impacts Screening*, as advised above, NRW (A) disagree with the scoping boundaries and therefore do not agree with the transboundary impacts search areas described. NRW (A) advise that the Management Unit is the appropriate scale for consideration of offsite impacts for marine mammals (IAMMWG 2015).

8 Marine Ornithology

8.1 Key Issues

125. NRW (A) advise that further information on how survey design has been arrived at is required, including results of a power analysis to detect the sample size needed for the analysis of aerial survey data.

126. NRW (A) highlight the availability of revised guidance for Red-Throated Diver displacement – see Joint SNCB Interim Advice on the Treatment of Displacement for Red-Throated Diver (2022). NRW (A) advise that the Mona offshore ornithology study should include the Potential Array Area with a 10 km buffer. It may help the reader to include a clearer visualisation of where this buffer does and does not fully reach 10 km, and the justification for this.

127. It is likely that all Welsh Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs) with marine or estuarine bird features should be scoped in at this stage, until surveys are complete and data analysis has been finalised.

8.2 Detailed comments

128. With reference to *Part 1: Section 4.8 Cumulative effects assessment*, NRW (A) advise that for marine ornithology, all developments including built, operational, under construction, consented and otherwise identified infrastructure projects which are within

the foraging ranges (see Woodward *et al*., 2019) of all designated sites scoped in for Likely Significant Effect, should be included within the cumulative assessment.

129. In *Part 2: Section 4.4.2 Study area* / *Part 3: Section 4.4.3.2* / *Figure 4.21*, in particular with reference to Red Throated Diver, further information on the use of a buffer that does not consistently exceed 10 km is required. NRW (A) advise the use of a 10 km buffer. It may help the reader to include a clearer visualisation of where this buffer does and does not fully reach 10 km. For further information, please see Joint SNCB Interim Advice on the Treatment of Displacement for Red-Throated Diver (2022).

130. NRW (A) agree with the approach outlined in *Part 2: Section 4.4.2.4* / *Part 3: Section 4.4.2.3 Study area*, including the use of published foraging ranges in Woodward *et al*., (2019), and the use of mean maximum foraging range +1 standard deviation (Mean Max +1SD) to estimate breeding site connectivity. All designated sites with named features whose foraging ranges fall within the Mean Max +1SD, should be included within the scoping assessment as it is not possible to know which sites might be affected until the surveys and work such as apportioning has been completed. Potential impacts on wintering bird features and on birds migrating to and from SPAs, along with estuarine SPA and SSSI features which could be affected by collision risk on migration, should also be included in scoping and screening. Given that populations of breeding seabird qualifying features at SPAs are afforded protection throughout the year, projects or plans remote from the breeding colony site should be subject to the HRA and EIA processes regardless of time of year at which birds may interact with those projects/plans, if an impact pathway exists. Therefore, there is a need for HRAs and EIAs to consider species at colonies that are within foraging distance of the proposed development during the breeding season, and to also consider assessment of impacts to birds from these colonies in the non-breeding season.

131. With reference to Part 2: Table 4.17, in addition to the Mean Max +1SD foraging ranges from Woodward *et al*.,(2019), site-specific tracking data is available for some species such as Northern Gannet at Grassholm SPA, and should also be assessed. These foraging ranges will identify designated sites which should be screened in for further consideration as part of the EIA process.

132. With reference to *Section 4.4.3.3 Site-specific surveys*, NRW (A) suggest that further information on how survey design has been arrived at would be useful, including more detail on the justification for 12% analysed. To determine whether survey coverage and design provide an adequate baseline characterisation, NRW (A) advise that evidence from a power analysis is used. The level of coverage required to be sufficient for baseline characterisation will depend on the nature of the area being surveyed and the abundance and distribution of receptors across the area. A power analysis should be undertaken to inform survey design and ensure that such designs maximise the probability of detecting changes in abundance and distribution through future comparison with data that may be collected post-consent. Webb *et al*., (2014) provide some examples of power analyses applied to sampling of focal bird species within a marine SPA.

133. With reference to Section 4.4.3.6 Site-specific surveys, it would be useful to clarify if the intention is to provide records of all species detected from aerial surveys.

134. NRW (A) agree that the use of species-specific Mean Max + 1SD as presented in Woodward *et al.*, (2019) and outlined in *Section 4.4.4.11 Designated sites*, is appropriate. This represents a relatively quick and straightforward approach to establishing connectivity between a proposal's location and a site's qualifying features, as is required to establish likely significant effects. However, there is the possibility that using this approach could miss out some colonies, therefore a sense check will need to be applied to ensure that all colonies where there is a potential for likely significant effect are included at the screening stage. Assessments should always be based upon the best and most up to date evidence available.

135. As noted by the applicant, the list of designated sites depicted in *Figure 4.22 (Parts 2 & 3) Marine nature conservation designations with relevance to offshore ornithology within the proximity of the Mona Potential Array Area / Mona Offshore Transmission Infrastructure Scoping Search Area*, needs to be significantly expanded to include all designated sites within Mean Max +1SD foraging ranges (Woodward *et al*., 2019) which overlap with the project array. These foraging ranges will identify designated sites which should be screened in for further consideration as part of the HRA and EIA processes.

136. With reference to *Section 4.4.7.3 Overview*, it would be useful to understand how the applicant proposes to determine flight height. NRW (A) are not yet satisfied that flight height calculations based on digital aerial survey data are accurate, so generic flight heights from Johnston *et al.*, (2014) should also be used in assessing collision risk.

137. NRW (A) seek clarification on whether the intertidal and nearshore waterbird surveys outlined in Section 4.4.3.3 Site-specific surveys were extended in 2021/22 and if or when they will be carried out in 2022/23.

138. NRW (A) advise that digital aerial survey data collected for this project should be the primary data source used for the analysis. However, useful supplementary data (e.g. tracking data) and information may be found in a number of sources in addition to those listed in *Part 2: Table 4.17* and *Part 3: Table 4.18 Summary of key desktop datasets and reports*, including:

- The outputs of the **Marine Ecosystems Research Programme**: MERP | Top Predators (marine-ecosystems.org.uk)
- **Future of the Atlantic Marine Environment (FAME) Project and Seabird Tracking and Research (STAR)**: FAME & STAR seabird (kittiwakes, guillemots, razorbills and shags) tracking projects | Marine Scotland Information
- **Review of Seabird Demographic Rates and Density Dependence**: Review of Seabird Demographic Rates and Density Dependence (JNCC Report No. 552)
- **Wetland Bird Survey**: Wetland Bird Survey | BTO - British Trust for Ornithology

- **Non-Estuarine Waterbird Survey:** Results of the third Non-Estuarine Waterbird Survey, including Population Estimates for Key Waterbird Species | BTO - British Trust for Ornithology

A literature search of published research papers and reports may also provide supplementary information to the applicant. The following links may also be of interest:

- **Apportioning**: Interim Guidance on apportioning impacts from marine renewable developments to breeding seabird populations in SPAs | NatureScot
- **Non-breeding season populations of seabirds in UK waters**: Population sizes for Biologically Defined Minimum Population Scale: Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS) - NECR164 (naturalengland.org.uk)
- **Population Viability Analysis Modelling Tool for Seabird Species**: PVA Tool (ec2-54-229-75-12.eu-west-1.compute.amazonaws.com)

Displacement Assessment**: Joint SNCB Interim Displacement Advice Note (jncc.gov.uk)Seascape, Landscape and Visual Resources**

139. The potential issues for NRW (A)'s statutory landscape planning remit concern the potential visual effect of the proposed Project Mona development upon the setting and outlook of designated landscapes within north Wales. Neither the offshore nor onshore elements of the scheme lie within a designated landscape.

140. NRW (A) are generally in agreement with the approach outlined in *Part 3: Section 9.1 Seascape, landscape and visual resources*, but would welcome further discussion with the applicant on interim findings, particularly around the options and alternatives stage and mitigation, prior to completion of the Preliminary Environmental Information Report (PEIR).

141. With reference to *Section 9.1.2 Study area*, NRW (A) are satisfied that the 1 km study area for the construction of the onshore transmission assets, the 50 km study area from the outer edge of the wind turbine array area, and the 10 km study area for the onshore transmission assets during the operation phase are proportionate.

142. NRW (A) are satisfied that the sources of published landscape and seascape baseline information listed in *Table 9.1 Baseline data sources*, have been appropriately identified.

143. NRW (A) are satisfied that the appropriate Designated Landscapes have been covered in Section *9.1.4 Baseline environment*, but would advise consulting CADW and Gwynedd Archaeological Planning Service regarding completeness of sites listed within the baseline environment and the specific resources of World Heritage Site, Scheduled Monuments and Registered Parks and Gardens. Please also consult Denbighshire County Council, Conwy County Council and Gwynedd County Council regarding

Special Landscape Areas and Viewpoints (receptors of high sensitivity) to be used in the assessment.

144. NRW (A) agree with *Table 9.2 Impacts proposed to be scoped into the project assessment of effects on seascape, landscape and visual resources*.

145. NRW (A) agree with Table 9.3 Impacts proposed to be scoped out of the project assessment for seascape, landscape and visual resources.

146. In *Section 9.1.6 Measures adopted as part of the project*, NRW (A) would advise referencing NRW's Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 2- Guidance on siting offshore wind farms Report No. 330 or other specific guidance used to inform the scheme's planning. Should the development have the potential to affect the setting of National Parks (NP) and Areas of Outstanding Natural Beauty (AONB), NRW (A) would expect the EIA to explain how this guidance has been used to moderate visual effects, in order to realise Guidelines for Landscape and Visual Impact Assessment (GLVIA) iterative design.

147. *Section 9.1.6.2 Measures adopted as part of the project*, suggests that mitigation will only be applied in cases where significant effects have been identified – presumably at the PEIR stage. NRW (A) advise that embedded mitigation (i.e. guidance set out in NRW's Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance Stage 2- Guidance on siting offshore wind farms Report No. 330) should be applied at the options and alternatives stage of the EIA process. NRW (A) advise that a more detailed explanation of how the above report has been applied within the scheme's planning is required.

148. NRW (A) advise that GLVIA3 iterative design is referred to in *Section 9.1.7.5 Proposed assessment methodology*, with an explanation of how it would be applied at key stages in the EIA process.

149. With reference to *Section 9.1.7 Proposed assessment methodology*, for designated landscapes where seascape provides a valued setting or outlook for visitors to the area, visually intrusive development can adversely affect public perceptions of the area's special qualities, which national policy seeks to conserve and enhance. NRW (A) therefore expect the assessment to treat each NP and AONB as a sensitive receptor. The assessment of effect however needs to draw upon the findings of the visual assessment. The singular and cumulative effect upon each NP and AONB will need to be assessed and reported upon.

150. With reference to *Section 9.1.8 Potential cumulative effects*, there are a number of operational wind farms along the north Wales coast that will need to be factored into the cumulative effects assessment, and photomontages required to explain the visual effect upon the setting of Designated Landscapes and the character of the north Wales coastline more generally. Operational wind farms include Rhyl Flats, North Hoyle, Burbo Banks, Gwynt y Mor and in planning - Awel y mor.

151. *Section 9.1.10 Potential transboundary impacts / Annex A Transboundary Impacts Screening* – NRW (A) advise that Natural England are consulted regarding potential visual effects upon Designated Landscapes in England.

9 Geology, Hydrogeology and Ground Conditions

152. Due to the Mona Onshore Transmission Infrastructure Scoping Search Area being so large NRW (A) cannot currently provide any targeted site-specific advice. Further aspects may become apparent when the detailed locations of the landfall, cable corridors and the shore construction site(s) have been refined. NRW (A) advise that Land Contamination, Water Features Survey (for water resources as well as water quality) and pollution prevention measures are scoped in for further assessment.

153. *Section 6.1.4.5 Baseline environment*, suggests that there are no Source Protection Zones (SPZ) in the area. It should be noted that there are SPZs at Trofarth Farm and Llannerch Park and these should be taken into consideration.

154. The baseline data resources presented in Section 6 are reasonable. However, in *Table 6.1 Baseline data sources*, there are references to some English data sources; all the same information for Wales should be available, however, it may have a different name or repository. For example, the Environment Agency might have some archive water quality data for Wales, however, water quality sampling is now undertaken by NRW.

155. It is worth noting that there is a public register for Wales for some environmental permissions such as licenced abstractions, waste, water quality and installations. This can be viewed on the NRW website.

156. NRW (A) note and concur with *Part 3: Section 6.1.2.2 Study area*, with regards to the definition of the study area for the transmission assets to be used in the assessments. NRW (A) agree with the proposed 1 km receptor buffer based on the available information. NRW (A) concur that dependant on specific activities it is proposed the 1 km receptor buffer may need to be changed, e.g. if a large groundwater abstraction or dewatering activity is proposed.

157. Contaminated land is mentioned within the Scoping Report. NRW (A) remind the applicant that both contaminated land as statutorily defined contaminated land under Part 2A of the Environmental Protection Act 1990, or land affected, and land affected by contamination (as often associated with brownfield sites) that needs to be dealt with through planning, should be scoped in.

158. It should be noted that there is Wales specific guidance on land contamination. Please refer to: Land Contamination: a guide for developers (WLGA, 2017) for the type of information that NRW (A) require in order to assess risks to controlled waters from the site.

159. NRW (A) note that *Table 6.3 Impacts proposed to be scoped out of the project assessment for geology, hydrogeology and ground conditions,* scopes out spillages. NRW (A) advise that further information with regards to the operational aspects should be provided to clarify how spillages have been ruled out, for example, will refuelling ever be necessary? Will the cable be fluid filled?

160. NRW (A) note that only desk-based assessment is proposed. Depending on the findings of the desk-based assessment, further intrusive works may need to be assessed.

10 Hydrology and Flood Risk

161. The Mona Onshore Transmission Infrastructure Scoping Search Area lies within zone C1 and C2 of the Development Advice Map (DAM) from TAN15: Development and Flood Risk. Flood Map for Planning (FMfP) shows the scoping search area within Zone 2/3 (Rivers and Sea).

162. NRW (A) are generally satisfied with *Section 6.2 Hydrology and flood risk* regarding what has been scoped into the project assessment to manage flood risk. The approach and reference documents to inform the Flood Consequence Assessment (FCA) also appear suitable.

163. There are site specific flood hydraulic models that NRW have commissioned that coincide with the scoping search area, which have not been referred to in the baseline data sources. NRW (A) advise these should be obtained and considered within the FCA. These include models associated with tidal flood risk and fluvial risks including some of the pumped systems due to the presence of NRW owned pumping stations. Models can be requested via: datadistribution@naturalresourceswales.gov.uk once cabling routes have been refined.

164. NRW (A) also note that the FCA will refer to the current Technical Advice Note (TAN) 15 (Welsh Government, 2004) and will also use the Emerging TAN 15: Development, Flooding and Coastal Erosion (Welsh Government, coming into force June 2023). NRW (A) advise that the NRW Flood Map for Planning (FMfP) is the more accurate data set on future flood risk (due to including allowances for climate change) than the current Development Advice Maps accompanying the existing TAN15. Whilst the scoping report refers to the FMfP all the corresponding figures showing risk areas use the Flood Risk Assessment Wales maps. The figures should be updated accordingly.

165. All designated main river and flood defence infrastructure crossings will be subject to a Flood Risk Activity Permit under the Environmental Permitting Regulations 2016 and crossing methods for each should be detailed in the FCA. NRW (A) advise that Trenchless technology should be the preferred method as it is less intrusive in terms of possible flood and environmental harm.

166. The detail outlined in *Section 6.2.4.9* does not appear to refer to the study area.

167. Tidal flood risk should consider using Coastal Design Sea Levels - Coastal Flood Boundary Extreme Sea Levels (2018) dataset whilst climate change allowances will refer to Climate change allowances and flood consequence assessments.

168. The relevant Lead Local Flood Authority (Conwy and/or Denbighshire Councils) will need to advise on surface water flood risk and drainage arrangements as the SuDS Approval Bodies.

11 Onshore biological environment

169. *Description of biodiversity* – the ES should include a description of all the existing natural resources and wildlife interests within, and in the vicinity of, the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

170. *Significance and Favourable Conservation Status* – NRW (A) advise that the EIA considers significance (both alone and in-combination) and where applicable, conservation status. In respect of conservation status, NRW (A) advise consideration is given to current conservation status (CCS), and demonstration of no likely detriment to maintenance of favourable conservation status (FCS) during construction, operation, and decommissioning phases of the scheme.

171. *Key Habitats* – any habitat surveys should accord with the Nature Conservancy Council (NCC) Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). NRW (A) advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present. NRW (A) further advise that Habitats Directive Annex 1 habitats are identified as part of this assessment.

172. *Protected Species* – NRW (A) advise that the site is subject to assessment to determine the likelihood of protected species and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and in the event that the surveys deviate, or there are good reasons for deviation, that full justification for this is included within the ES.

173. Should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium, and long-term together with any mitigation and compensation measures proposed to offset the impacts identified. NRW (A) advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long-term financial, tenure, and management responsibility. Where the potential for significant impacts on protected species is identified, NRW (A) advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.

174. Where a European Protected Species is identified and the development proposal is predicted to likely contravene the legal protection they are afforded, a licence should be sought from NRW's Species Licensing Team Natural Resources Wales / Species licensing. The ES must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, Section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The relevant decision maker will take them into account when considering the EIA where a European Protected Species is present.

175. *Local Biodiversity Interests* – NRW (A) recommend that the developer consults the local authority ecologists on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.

176. NRW (A) would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (*e.g.* bat groups, mammal groups).

177. *Legislation and Policy Compliance Review* – NRW (A) advise that provisions of the EIA audit comply in respect of relevant nature conservation legislation (UK and Wales) together with relevant local and national policies including BS 42020:2013.

178. NRW (A) note the designated sites listed in *Table 7.2 Designated sites*, but would highlight that the ecologically designated terrestrial sites that may be affected will be agreed with relevant stakeholders when the location of the onshore transmission assets has been refined. NRW (A) will provide further comments once in receipt of the Preliminary Environmental Information Report (PEIR) and the Environmental Statement (ES).

12 Other Environmental Topics

12.1 Waste

179. Any waste materials generated during the proposed development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990 and NRW relevant guidance on waste management.

180. Carriers transporting waste from the site must be registered waste carriers and the movement of any Hazardous Waste from the site must be accompanied by Hazardous Waste consignment notes.

181. If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site must be done in consultation with NRW.

182. NRW should be contacted to discuss the necessity for an exemption or permit for any material imported to, treated on, and exported from the site. Please refer to Natural Resources Wales / Guidance on importing and exporting waste for further details.

183. The location of historic landfills to the site works must be checked before work commences.

184. Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be 110% of the capacity of the tank; all filling points, gauges, vents, and sight glasses must be located within the bund. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund; refuelling should be supervised at all times - and preferably done on an impermeable surface.

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From: [redacted]
To: Mona Offshore Wind Project
Subject: EN010137-000008 Mona Offshore Wind
Date: 30 May 2022 11:26:24
Attachments: [redacted]

OFFICIAL

[redacted]

Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP22/097

Your Ref: EN010137-000008

Date: 30 May 2022

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: EN010137-000008
PROPOSAL: Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)
LOCATION:

Dear Sir/Madam,

Thank you for your email dated **5 May 2022** together with the opportunity to comment on this proposal.

Network Rail has no objection in principle to the above proposals. Due to part of the proposals being near to Network Rail land and our infrastructure and to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission.

Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact assetprotectionwales@networkrail.co.uk.

The site is located within an area of historic mining for metals. Network Rail wish to be consulted on any site investigation and/or remediation works for historic/ abandoned mining hazards, alongside Network Rail's infrastructure. Please contact nationalminingengineer@networkrail.co.uk and Asset Protection Wales.

LEVEL CROSSINGS
As there is a level crossing in the vicinity then no part of the development shall cause any existing level crossing road signs or traffic signals or the crossing itself to be obscured. Clear sighting of the crossing must be maintained for the construction/operational period and as a

permanent arrangement. The same conditions apply to the rail approaches to the level crossing, This stipulation also includes the parking of vehicles, caravans, equipment and materials etc, which again must not cause rail and road approach sight lines of the crossing to be obstructed. At no point during construction on site or after completion of works should there be any deterioration of the ability of pedestrians and vehicles to see the level crossing and its signage. There must be no reduction in the distance that pedestrians and vehicles have sight of the warning signs and the crossing itself. Network Rail reserves the right to provide and maintain existing railway signals/signs (whistle boards etc) and level crossing equipment along any part of its railway.

Yours Sincerely,

Grace Lewis
Town Planning Technician Wales and Western
Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
E [redacted]@networkrail.co.uk
www.networkrail.co.uk/property

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.

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From: [redacted]
To: Mona Offshore Wind Project
Subject: FW: EN010137 - Mona Offshore Wind Farm - EIA Scoping Notification and Consultation
Date: 10 May 2022 17:38:36
Attachments: [redacted]

Dear Hannah,

Thank you for your email and attached letter regarding the EIA scoping for the above proposed windfarm.

On behalf of Powys County Council, I confirm that I have no comments to make on the scoping proposals.

Yours sincerely,
Peter

Peter Morris BSC (Hons), DipTP, MRTPI

Arweinydd Professiynol – Cynllunio
Professional Lead – Planning

planning.services@powys.gov.uk
[redacted]

Croesawu gohebiaeth yn Gymraeg /
We welcome correspondence in Welsh

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Public Health Wales
Capital Quarter 2, Tyndall Street, Cardiff, CF10 4BZ
Iechyd Cyhoeddus Cymru
Capital Quarter 2, Tyndall Street, Caerdydd, CF10 4BZ

30th May 2022

Ms Hannah Terry
Senior EIA Advisor
The Planning Inspectorate
Environmental Services, Central Operations
Temple Quay House
2, The Square
Bristol, BS1 6PN

Your Ref: EN010137-000008
Our Ref: A0LD2921

Dear Ms Terry

Nationally Significant Infrastructure Project (NSIP)
Mona Offshore Wind Project; Scoping Report

Thank you for inviting us to respond to this initial scoping consultation. We understand that the UK Health Security Agency (UKHSA) will be providing a separate response; however, the Well-being of Future Generations (Wales) Act 2015 requires public bodies in Wales to think about the long-term impact of plans to prevent persistent problems such as poverty, health inequalities and climate change. We therefore welcome the opportunity to comment on your proposals and how these may affect public health in Wales, specifically.

Proposed Development

The Mona Offshore Wind Project is an offshore generating station with a capacity of greater than 350MW located in both Welsh and English waters and therefore is a Nationally Significant Infrastructure Project (NSIP). The Mona Potential Array Area (i.e. the area within which the offshore wind turbines will be located) is 449.97km2 in area and is located 28.2km (15.2nm) from the Anglesey coastline, 39.9km (21.5nm) from the northwest coast of England and 42.6km (23nm) from the Isle of Man (when measured from Mean High Water Springs (MHWS)).

The Mona Offshore Wind Project will be comprised of up to 107 wind turbines. The final number of wind turbines will be dependent on specific types of turbine used and the results of a survey which will be carried out at a later stage.

Overall Conclusion

Subject to the consideration of the points raised below and the project being operated in line with current sector guidance and best available techniques (BAT), we have no grounds for objection based on the information provided in the consultation documents available. We support the overall reduction of Green

House Gases (GHGs) i.e. CO_2, due to their contribution to climate change; which presents significant public health risks.

Public Health Risk Assessment

Risk assessing the health of individuals and/or populations is a complex process due to the variety of interactions with different determinants of health including but not limited to lifestyle and social, deprivation, cultural, economic and environmental factors. This public health risk assessment is based on the documentation provided and should be considered in the broadest possible sense to avoid human health harms – both physical and mental.

It is noted that the combined environmental effects on populations will be considered, taking into consideration potential for cumulative effects to occur as a result of other projects or activities within and outside the Mona project area. **We encourage all environmental hazards and impacts on sensitive human receptors to be considered simultaneously throughout all stages of the proposed development, as well as in conjunction with any other developments planned in the nearby area.**

It is stated that EMF considerations will be scoped out. **We encourage adequate assessment of possible impacts to receptors is carried out before scoping out of the ES.**

It is noted that the impact on human receptors arising from air emissions generated by vehicle traffic and/or fugitive dusts during construction, operation and maintenance of the onshore transmission assets will be scoped out of the plans. Pollutants such as particulate matter (PM) and nitrogen dioxide (NO_2) are non-threshold pollutants; meaning that health effects can be experienced by individuals at much lower levels than the standards set. **It is important to mitigate and minimise public exposure as much as possible to these non-threshold air pollutants so as to not create, or further add to, health inequalities. We encourage this to be considered in detail during design, development, construction and operation of the purposed activity.**

Noise and vibration are to be considered during construction, operation and maintenance, and decommissioning of the transmission assets of the project. **We would advise for all environmental hazards and impacts on human receptors to be considered simultaneously throughout all stages of the proposed development i.e. air pollution AND noise pollution, as well as in conjunction with any other developments planned in the nearby area.**

We agree that flood risk should be considered during every stage of the project to avoid any adverse impact on the onshore locale.

We trust you find this information useful.

Yours sincerely,

Environmental Public Health Service Wales

From: [redacted]
To: Mona Offshore Wind Project
Subject: EN010137-000008 MONA OWF Scoping
Date: 25 May 2022 22:09:12
Attachments: [redacted]

Dear Planning Inspectorate,

I can confirm that the RCAHMW has no comment to make on the scoping report for the proposed Mona OWF from the perspective of any potential impact of the project on marine archaeology. We are happy for the EIA process and resulting ES to proceed as proposed in the scoping report.

Yours

Julian

CBHC RCAHMW

Comisiwn Brenhinol
Henebion Cymru
Royal Commission on the Ancient and Historical Monuments of Wales

Dr Julian Whitewright

Dysgwr

Uwch Ymchwilydd (Arforol) | Senior Investigator (Maritime)

Ffordd Penglais, Aberystwyth, SY23 3BU

[redacted]

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www.cbhc.gov.uk | www.rcahmw.gov.uk

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Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn peri oedi.
We welcome correspondence in Welsh and English. Corresponding in Welsh will not lead to any delay.

Yn unol â Rheoliadau Safonau'r Gymraeg (Rhif 2) 2016, mae gennych hawl i gyfathrebu a gohebu â Chomisiwn Brenhinol Henebion Cymru yn eich dewis iaith. Er mwyn sicrhau ein bod yn cyflawni'r hawl, rhowch wybod i ni a ydych yn dymuno derbyn gohebiaeth a/neu alwadau ffôn oddi wrthym yn y Gymraeg. Bydd yr wybodaeth hon yn cael ei chofnodi gennym ni, a byddwn yn defnyddio'r iaith o'ch dewis ym mhob cyfathrebu yn y dyfodol. Diolch.

Under the Welsh Language Standards (No. 2) Regulations 2016, you have the right to communicate and correspond with the Royal Commission on the Ancient and Historical Monuments of Wales in your preferred language. To ensure we uphold this right, please let us know whether you wish to receive correspondence and/or telephone calls from us in Welsh. This information will be recorded by us, and we will use your preferred language in all future communication. Thank you.

From: [redacted]
To: Mona Offshore Wind Project; Planningsouth
Subject: RE: EN010137 - Mona Offshore Wind Farm - EIA Scoping Notification and Consultation
Date: 06 May 2022 12:46:19
Attachments: [redacted]

Thank you for the above consultation.

I have reviewed the proposals as set out in 3.5.2 and 3.5.3 of Part 1 and para 2.4.5.2 in Part 3 of the Scoping Report and provide comments for SP Energy Networks who operate and manage the electricity network up to 132kV on behalf of the licenced network operator, SP Manweb, for the onshore area in the proposed scheme. In general, SP Energy Networks has no objection in principle to the proposed off -shore development subject to required measures to protect SP Manweb onshore network assets and ensure safe working around the affected network. It is suggested the EIA includes a written section and plans showing where the proposed crossing points of the proposed on-shore cabling and construction corridors would intersect with SP Manweb network to enable further advice to be provided in terms of where particular care will need to be taken to avoid these assets. There is already another proposed off-shore scheme which is proposing an on-shore cable route to a similar location so it is important that the schemes between them avoid cumulative impacts on SP Manweb network assets.

Discussions will be needed with SP Manweb where proposed crossing points may require existing network to be diverted.

Where SP Manweb assets are affected, there will need to be protective provisions in place to ensure construction and operations which directly affect the network or are in close proximity do not undermine the safe operation of this network. Until the protective provisions are drafted and discussed and agreed with SP Manweb, then objection is raised to there being no provision in the application to such measures.

Having reviewed the scoping report, I can see no reference to how the existing network crossings will be managed.

The avoidance of any adverse impact on this network is critical as we drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. SP Energy Networks is investing in its network to meet the UK and devolved Governments ambitious decarbonisation targets for Net Zero. The next decade will be crucial in preparing the grid for these changes and this is why we are very interested in being able to comment on the proposals which may undermine maintaining and developing a suitable future grid network.

Furthermore, SP Manweb assets will be installed with appropriate land rights and these will need to be reviewed as part of new rights being sought and SP Manweb will be a land interest in this matter which to date has not been the case.

Mitigation proposals will also need to take account of SP Manweb assets and the operational requirements.

The applicant is encouraged to discuss the above and any further matters which may arise following ongoing review of the proposals with SP Manweb representatives as soon as possible.

I would appreciate you confirming the above comments can be taken into account.
Regards

Steve Edwards

SP ENERGY NETWORKS

Land & Planning
Senior Environmental PlannerTel: [redacted]

Cheshire, Merseyside, North Wales & North Shropshire
Connections 0845 270 0783
General enquiries 0330 10 10 444

Ysgrifennwch ataf yn Gymraeg neu Saesneg
Please write to me in Welsh or English

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www.gov.uk/coalauthority

The Coal Authority
Resolving the impacts of mining

For the attention of Ms H Terry – Senior EIA Advisor
The Planning Inspectorate

Your ref: EN010137 - 000008

[By email: MonaOffshoreWindProject@planninginspectorate.gov.uk]

25th May 2022

Dear Ms Terry

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Mona Offshore Wind Limited for an Order granting Development Consent for the Mona Offshore Wind Project (the Proposed Development)

Thank you for your notification received on the 5th May 2022 in respect of the above scoping consultation.

The Offshore Wind Project is not located in an area where our records indicate there are recorded coal mining features present at shallow or shallow depth.

On this basis the Planning team at the Coal Authority have no specific comments to make.

Please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

[redacted]

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation

records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

Towyn & Kinmel Bay Town Council

Community
Resource Centre
The Square
Off Foryd Road
Kinmel Bay
Conwy
E-Mail: Clerk@tkbtc.co.uk
Tel: [redacted]

19 May 2022

Planning Applications – Consultation Response

Application Ref No.	Location and Proposal	Towyn & Kinmel Bay Town Council Recommendation
EN010137	Mona Offshore Wind Project	No Objection

Dylan Thomas
Clerk to the Council

From: [redacted]
To: Mona Offshore Wind Project
Subject: RE: EN010137 - Mona Offshore Wind Farm - EIA Scoping Notification and Consultation
Date: 23 May 2022 12:49:06
Attachments: [redacted]

Good afternoon Hannah,

I can confirm that Trinity House would expect the following to form part of the Environmental Statement:

Navigation Risk Assessment

- Comprehensive vessel traffic analysis in accordance with MGN 654.
- The possible cumulative and in-combination effects on shipping routes and patterns should be adequately assessed, particularly in regards to the planned Morgan and Morecambe offshore wind farm projects.

Risk Mitigation Measures

- We consider that this development will need to be marked with marine aids to navigation by the developer/operator in accordance with the general principles outlined in IALA (International Association of Marine Aids to Navigation and Lighthouse Authorities) Guideline G1162 - The Marking of Offshore Man-Made Structures as a risk mitigation measure. In addition to the marking of the structures themselves, it should be borne in mind that additional aids to navigation such as buoys may be necessary to mitigate the risk posed to the mariner, particularly during the construction phase. All marine navigational marking, which will be required to be provided and thereafter maintained by the developer, will need to be addressed and agreed with Trinity House. This will include the necessity for the aids to navigation to meet the internationally recognised standards of availability and the reporting thereof.
- Assessment of impact on existing aids to navigation.

A decommissioning plan, which includes a scenario where on decommissioning and on completion of removal operations an obstruction is left on site (attributable to the wind farm) which is considered to be a danger to navigation and which it has not proved possible to remove, should be considered. Such an obstruction may require to be marked until such time as it is either removed or no longer considered a danger to navigation, the continuing cost of which would need to be met by the developer/operator.

The possible requirement for navigational marking of the export cables and the vessels laying them. If it is necessary for the cables to be protected by rock armour, concrete mattresses or similar protection which lies clear of the surrounding seabed, the impact on navigation and the requirement for appropriate risk mitigation measures needs to be assessed.

Kind regards,

Stephen Vanstone
Navigation Services Officer | Navigation Directorate | Trinity House
[redacted]@trinityhouse.co.uk | [redacted]
www.trinityhouse.co.uk

TRINITY HOUSE

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@phe.gov.uk
www.gov.uk/ukhsa

Your Ref: EN010137
Our Ref: 59341

Ms Hannah Terry
Senior EIA Advisor
The Planning Inspectorate
Environmental Services, Central Operations
Temple Quay House
2, The Square
Bristol, BS1 6PN

26th May 2022

Dear Ms Terry

Nationally Significant Infrastructure Project
Mona Offshore Wind Project
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). It is noted that population and human health will be considered within a technical appendix and not form a separate chapter within the ES. Given the current knowledge of the scheme and potential impacts this appears to be a proportionate approach.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

We are content with the promoter's rationale in identifying and scoping out certain environmental aspects due to their insignificance of impact.

It should be noted that Public Health Wales is the national public health agency in Wales who will take the lead in health and wellbeing considerations.

Recommendation

The current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF). We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

However, the scoping report does not consider any cumulative effects from neighbouring off-shore energy developments. Consideration should be given to the co-ordinated use of shared landfall and cable export routes to reduce environmental impact.

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1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

We look forward to receiving the ES in due course.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.